

IN THE COURT OF COMMON PLEAS  
TRUMBULL COUNTY, OHIO

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2013 AUG 18

Attorney General  
Charitable Law Section

STATE OF OHIO, *ex rel.*  
MIKE DEWINE, OHIO ATTORNEY  
GENERAL

Plaintiff,

vs.

PJG ENTERPRISES, LLC  
206 North State Street  
Girard, Ohio 44420

PAUL GROSSI  
53 North Brockway Ave.  
Youngstown, Ohio 44509

THE AMERICAN BREAST CANCER  
FEDERATION  
53 North Brockway Ave.  
Youngstown, Ohio 44509

THE AMERICAN VETERANS  
FEDERATION  
53 North Brockway Ave.  
Youngstown, Ohio 44509

BRANDON P. NORBE MALONE  
53 North Brockway Ave.  
Youngstown, Ohio 44509

AMAURY CRUZ SERRANO  
53 North Brockway Ave.  
Youngstown, Ohio 44509

GARY JONES  
424 North Walnut St.  
East Orange, New Jersey 07017

Defendants.

CASE NO.: 2012 CV 994

JUDGE ANDREW LOGAN

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2013 SEP 03

Attorney General  
Charitable Law Section

AGREED ENTRY AND ORDER OF  
PJG ENTERPRISES, LLC

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The Ohio Attorney General filed this action on April 27, 2012 alleging that Defendant PJG Enterprises, LLC violated the Ohio Charitable Organizations Act, R.C. § 1716.01 *et seq.* The Attorney General alleged that Defendant PJG Enterprises, LLC failed to register and report in violation of R.C. § § 1716.02, 1716.04, and 1716.07, engaged in prohibited acts and practices while conducting charitable solicitations in violation of R.C. § 1716.14, and failed to cooperate with an investigation of the Ohio Attorney General in violation of R.C. § 1716.15(E)(3). Defendant PJG Enterprises, LLC denies the Attorney General's allegations but agrees to this Agreed Entry and Order as a resolution of all claims relating to the Attorney General's Complaint.

The Court recognizes that in executing this Agreed Entry and Order the Attorney General and Defendant PJG Enterprises, LLC have negotiated and agreed to the terms of this Agreed Entry and Order. Based upon, among other things, the Attorney General's Amended Complaint, Motion for Temporary Restraining Order and Preliminary Injunction, Defendant's Answer, the representations and terms contained in the discussions among counsel, and the agreement of counsel for the parties executing this Agreed Entry and Order, the Court hereby ORDERS, ADJUDGES, AND DECREES as follows:

1. Defendant PJG Enterprises, LLC agrees that it will not participate in solicitations in the State of Ohio for any charitable purpose or on behalf of any charitable organization following the date this Agreed Entry and Order is signed. This exclusion includes, but is not limited to, solicitations conducted as a professional solicitor, fund-raising counsel, or commercial

co-venturer, as those terms are defined in Revised Code Chapter 1716, on behalf of any charitable organization or charitable purpose.

2. Defendant PJG Enterprises, LLC shall pay the sum of \$350,000.00 to the Office of the Ohio Attorney General by delivering to the to the Office of the Attorney General, Charitable Law Section, at 150 East Gay Street, 23<sup>rd</sup> Floor, Columbus, Ohio, 43215, Attn: Dionne DeNunzio, a certified check or money order in this amount, made payable to “Treasurer, State of Ohio.” The total sum shall be distributed by the Attorney General to nonprofit organizations that support patients with breast cancer.

3. Counsel approving this Agreed Entry and Order have advised this Court that they have full authority to sign on behalf of the client they represent. Furthermore, each asserts that the client’s commitment to the terms of this document is made in reliance upon the agreements or obligations undertaken by the other parties that have consented to the filing of this Agreed Entry and Order.

4. This Agreed Entry and Order constitutes the conclusion of all claims between the Attorney General and Defendant PJG Enterprises, LLC in this case. This Court retains jurisdiction to enforce the terms of this Agreed Entry and Order.

5. Each party shall bear their own costs, including any possible attorneys’ fees, court costs, or other expenses in this litigation.

6. The above-styled case will be dismissed with prejudice subject only to reinstatement for purposes of enforcing this Agreed Entry and Order.

IT IS SO ORDERED.

Date: \_\_\_\_\_

**JUDGE ANDREW D. LOGAN**

JUDGE ANDREW LOGAN

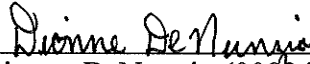
**AGREED:**

PJG ENTERPRISES, LLC



Signature on behalf of  
PJG Enterprises, LLC

MIKE DEWINE  
OHIO ATTORNEY GENERAL



Dionne DeNunzio (0082478)  
Associate Assistant Attorney General  
Charitable Law Section  
150 E. Gay Street, 23<sup>rd</sup> Floor  
Columbus, Ohio 43215

FILED  
COURT OF COMMON PLEAS  
AUG 26 2013  
TRUMBULL COUNTY, OH  
KAREN INFANTE ALLEN, CLERK



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