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TERESA A. DANKOVIC
CLERK OF COURTS
GUERNSEY CO., OHIO

IN THE COURT OF COMMON PLEAS
GUERNSEY COUNTY, OHIO

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

Plaintiff,

vs.

FROG POND FARM, INC.
58820 Claysville Road
Cambridge, OH 43725

and

LISA GORDON
64385 Larrick Ridge Road
Cambridge, OH 43725

Defendants.

CASE NO.: 14CV66

JUDGE Ellwood

COMPLAINT OF OHIO ATTORNEY
GENERAL MIKE DEWINE

JURY DEMAND ENDORSED HEREON

Plaintiff, State of Ohio *ex rel.* Mike DeWine, Ohio Attorney General, hereby alleges:

I. Jurisdiction and Venue

1. Plaintiff, State of Ohio, by and through the Attorney General of Ohio, Mike DeWine, having reasonable cause to believe that violations of Ohio law have occurred, brings this complaint in the public interest and under the authority vested in the Attorney General by Ohio Revised Code Section 109.23 *et seq.* ("Ohio Charitable Trust Act"), Ohio Revised Code Chapter 1716 ("Ohio Charitable Organizations Act"), and the Attorney General's common law authority to enforce charitable trusts.

2. Defendant Frog Pond Farm, Inc.'s principal place of business is at 58820 Claysville Road, Cambridge, OH 43725.
3. Defendant Lisa Gordon resides at 64385 Larrick Ridge Road, Cambridge, OH 43725.
4. Defendants' actions, as described herein, occurred in the State of Ohio, involved residents of the State of Ohio, and constitute violations of the common law, Ohio Charitable Trust Act, and Ohio Charitable Organizations Act.
5. This is an action seeking injunctive relief, equitable relief, and damages for Defendants' violations of the common law, Ohio Charitable Trust Act, and Ohio Charitable Organizations Act. The amount in controversy exceeds \$25,000.00.

II. Activities of Defendants Which Give Rise to this Complaint

6. Defendant Lisa Gordon is one of the co-founders, along with her husband and mother, and is the president of Frog Pond Farm, Inc.
7. Defendant Lisa Gordon filed Frog Pond Farm's Articles of Non-Profit Organization with the Ohio Secretary of State on March 5, 2004.
8. Defendant Frog Pond Farm's stated charitable purpose was "to give equines a much needed chance for survival. We welcome draft horses and draft ponies that are no longer needed or wanted by the current owners, remove them from slaughter sale situations or take from abuse/neglect cases and placed in homes that both want them and will provide a safe, secure and permanent home."
9. To fulfill this charitable purpose, Defendants would buy or otherwise rescue horses from slaughter situations, take care of them, and then facilitate adoption.
10. Defendants solicited money from the public by telling them that their donation would be used to rescue horses.

11. Defendant Frog Pond Farm, Inc. is a “charitable organization” as that term is defined in R.C. § 1716.01(A) and a “charitable trust” as that term is defined in R.C. § 109.23.
12. The funds raised and held by Defendants on behalf of charitable purposes are subject to a valid “charitable trust” under R.C. § 109.23.
13. Defendant Lisa Gordon has fiduciary duties under R.C. § 109.23 *et seq.*, R.C. § 1716.17, and the common law.
14. The Ohio Charitable Trust Act enumerates certain registration and reporting requirements with which charitable trusts established or active in Ohio must comply and it prohibits certain acts and practices in the administration of any charitable trusts.
15. Defendants failed to register with the Ohio Attorney General as a charitable trust established or active in Ohio within six months after the creation of the charitable trust from 2004-2012.
16. The Ohio Charitable Organizations Act enumerates certain registration and reporting requirements with which a charitable organization must comply if it intends to solicit contributions in Ohio and it prohibits certain acts and practices when soliciting for such contributions.
17. Defendants failed to file a Registration Statement with the Ohio Attorney General before engaging in solicitation.
18. Defendants failed to file a copy of the current charter, articles of incorporation, agreement of association, instrument of trust, constitution, or other organizational instrument, and a copy of the bylaws of Frog Pond Farm, Inc. with the Ohio Attorney General before engaging in solicitation.
19. Defendants failed to file a statement setting forth the place where and the date when Defendant Frog Pond Farm was legally established, the form of its organization, and its tax

- exempt status, with a copy of its federal tax exemption determination letter, with the Ohio Attorney General before engaging in solicitation.
20. Defendants failed to file registration fees with the Ohio Attorney General before engaging in solicitation.
 21. Defendants failed to file a financial report with the Ohio Attorney General for Fiscal Years 2004, 2005, 2006, 2007, 2008, and 2013.
 22. Defendant Lisa Gordon provided false and misleading information to the attorney general in response to a request from the attorney general under section R.C. § 1716.15 by stating that she was providing all transactions from the charity's PayPal account while leaving out numerous transactions.
 23. Defendant Lisa Gordon knowingly made a false statement to the attorney general by stating in an Examination Under Oath conducted pursuant to R.C. § 1716.15 (1) that she never used charitable funds for non-charitable purposes and (2) that she supplied to the attorney general's office all transactions from the charity's PayPal account.
 24. Defendant Lisa Gordon has personally benefitted at the expense of charitable beneficiaries by taking proceeds collected for charitable purposes and using that money for her own personal and other unlawful purposes.

COUNT ONE
FAILURE TO REGISTER

25. R.C. § 109.26 requires every charitable trust established or active in Ohio to register with the Ohio Attorney General.
26. Defendants have violated R.C. § 109.26 by failing to register with the Ohio Attorney General as a charitable trust established or active in Ohio from 2004 through July of 2013.

COUNT TWO
FAILURE TO FILE A REGISTRATION STATEMENT

27. R.C. § 1716.02(A) requires every charitable organization to file a Registration Statement with the Ohio Attorney General before engaging in any charitable solicitation in Ohio.
28. Defendants have violated R.C. § 1716.02(A) by failing to file a Registration Statement with the Ohio Attorney General before engaging in any charitable solicitation in Ohio in fiscal years 2004, 2005, 2006, 2007, 2008, and 2012.

COUNT THREE
FAILURE TO FILE ARTICLES

29. R.C. § 1716.02(C)(1)(a) requires every charitable organization that is required to register under Chapter 1716 to file a copy of the current charter, articles of incorporation, agreement of association, instrument of trust, constitution, or other organizational instrument, and a copy of the bylaws of the charitable organization with the Ohio Attorney General before engaging in any charitable solicitation in Ohio.
30. Defendants have violated R.C. § 1716.02(C)(1)(a) by failing to file a copy of the current charter, articles of incorporation, agreement of association, instrument of trust, constitution, or other organizational instrument of Defendant Frog Pond Farm, Inc., and a copy of its bylaws with the Ohio Attorney General before engaging in any charitable solicitation in Ohio.

COUNT FOUR
FAILURE TO FILE A STATEMENT

31. R.C. § 1716.02(C)(1)(b) requires every charitable organization that is required to register under Chapter 1716 to file a statement setting forth the place where and the date when the charitable organization was legally established, the form of its organization, and its tax

exempt status, with a copy of its federal tax exemption letter, with the Ohio Attorney General before engaging in any charitable solicitation in Ohio.

32. Defendants have violated R.C. § 1716.02(C)(1)(b) by failing to file a statement setting forth the place where and the date when Defendant Frog Pond Farm, Inc. was legally established, the form of its organization, and its tax exempt status, with a copy of its federal tax exemption letter, with the Ohio Attorney General before engaging in any charitable solicitation in Ohio.

COUNT FIVE
FAILURE TO FILE FEES

33. R.C. § 1716.02(D)(1) requires every charitable organization that is required to register under Chapter 1716 to pay registration fees with the Ohio Attorney General before engaging in any charitable solicitation in Ohio.
34. Defendants have violated R.C. § 1716.02(D)(1) by failing to pay registration fees with the Ohio Attorney General before engaging in any charitable solicitation in Ohio.

COUNT SIX
FAILURE TO FILE FINANCIAL REPORT

35. R.C. § 1716.04 requires every charitable organization that is required to register pursuant to Chapter 1716 of the Ohio Revised Code to file a financial report with the Ohio Attorney General.
36. Defendants have violated R.C. § 1716.04 by failing to file a financial report with the Ohio Attorney General.

COUNT SEVEN
COMMITTING DECEPTIVE ACTS

37. R.C. § 1716.14(A)(1) prohibits committing any deceptive act while soliciting for a charitable organization or charitable purpose.

38. Defendants have violated R.C. § 1716.14(A)(1) by committing deceptive acts while soliciting for a charitable organization and/or for a charitable purpose by knowingly misrepresenting material facts to potential donors by telling them that their donation would be going to a charitable organization and/or to a charitable purpose and inducing such donors to contribute to the charitable organization and/or charitable purpose when Defendants used that money for their own personal and other unlawful purposes.

COUNT EIGHT
MISLEADING AS TO MATERIAL FACTS

39. R.C. § 1716.14(A)(2) prohibits misleading any person as to any material fact concerning the solicitation of contributions for a charitable organization or charitable purpose.

40. Defendants have violated R.C. § 1716.14(A)(2) by misleading potential donors as to material facts concerning the solicitation of contributions for a charitable organization and/or a charitable purpose by representing to potential donors that their donation would be going to a charitable organization and/or a charitable purpose when Defendants used that money for their own personal and other unlawful purposes.

COUNT NINE
FALSIFICATION

41. R.C. § 2921.13(A) prohibits any person from knowingly making a false statement, or knowingly swearing or affirming the truth of a false statement previously made, when, *inter alia*, (1) the statement is made in any official proceeding; (3) the statement is made with purpose to mislead a public official's official function; (6) the statement is sworn or affirmed before a notary public or another person empowered to administer oaths; and (9) the statement is made with purpose to commit or facilitate the commission of a theft offense.

42. R.C. § 2921.13(G) states that a person who violates § 2921.13 is liable in a civil action to any person harmed by the violation for injury, death, or loss to person or property incurred as a result of the commission of the offense and for reasonable attorney's fees, court costs, and other expenses incurred as a result of prosecuting the civil action commenced under this division.
43. Defendant Lisa Gordon has violated R.C. § 2921.13 by providing false and misleading information to the attorney general in response to a request from the attorney general under section R.C. § 1716.15 by stating that she was providing all transactions from the charity's PayPal account while leaving out numerous transactions. This statement was made with the intent to mislead the Attorney General's Office in performing its official function. This false statement caused injury to the Attorney General's Office.
44. Defendant Lisa Gordon has violated R.C. § 2921.13 by stating in an Examination Under Oath conducted pursuant to R.C. § 1716.15 that (1) she never used charitable funds for non-charitable purposes and (2) she supplied to our office all transactions from the charity's PayPal account. These statements were made with the intent to mislead the Attorney General's Office in performing its official function. These false statements caused injury to the Attorney General's Office.

COUNT TEN
FILING FALSE OR MISLEADING INFORMATION

45. R.C. § 1716.14(A)(10) prohibits Filing false or misleading information in response to a request from the Ohio Attorney General under section 1716.15 of the Revised Code.
46. Defendants have violated R.C. § 1716.14(A)(10) by filing false and misleading information with the Ohio Attorney General by stating that all of Frog Pond Farm's bank and PayPal transactions were submitted to our office when this was not the fact.

COUNT ELEVEN
FAILURE TO COMPLY AND OPERATING IN VIOLATION OF CHAPTER 1716

47. R.C. § 1716.14(A)(12) prohibits operating in violation of Chapter 1716 or failing to comply with Chapter 1716.
48. Defendants have violated R.C. § 1716.14(A)(12) for the reasons stated above.

COUNT TWELVE
BREACH OF FIDUCIARY DUTIES

49. R.C. § 1716.17 states in pertinent part: “Every person who solicits, collects, or expends contributions on behalf of a charitable organization or for a charitable purpose, or who conducts a charitable sales promotion, and every officer, director, trustee, or employee of that person who is concerned with the solicitation, collection, or expenditure of those contributions shall be considered a fiduciary and acting in a fiduciary capacity.”
50. R.C. § 109.23(A) states: “Charitable trust means any fiduciary relationship with respect to property arising under the law of this state or of another jurisdiction as a result of a manifestation of intention to create it, and subjecting the person by whom the property is held to fiduciary duties to deal with the property within the state for any charitable, religious, or educational purpose.”
51. Defendant Lisa Gordon owed fiduciary duties to the charitable beneficiaries of Defendant Frog Pond Farm including the duty of care, the duty of loyalty, the duty to properly manage accounts, and the duty to comply with law, as well as other duties, including, but not limited to, the duty to not waste charitable trust assets and to act in the best interest of the charity.
52. Defendant Lisa Gordon violated her fiduciary duty of good faith by failing to act with the degree of care and skill which an ordinarily prudent person would have used in dealing with his or her own property.

53. Defendant Lisa Gordon violated her fiduciary duty of loyalty by diverting the charitable assets of Defendant Frog Pond Farm for her own personal use and by placing her personal interests above the interests of Frog Pond Farm and its charitable beneficiaries.
54. Defendant Lisa Gordon violated her fiduciary duty to not commingle charitable assets of Defendant Frog Pond Farm with her own personal assets.
55. Defendant Lisa Gordon violated her fiduciary duty to account for all assets of Defendant Frog Pond Farm collected and expended for charitable purposes.
56. Defendant Lisa Gordon violated her fiduciary duty to use all the money or assets collected on behalf of Defendant Frog Pond Farm for charitable purposes.
57. Defendant Lisa Gordon violated her fiduciary duty to comply with the law by, among other things, using charitable assets of Defendant Frog Pond Farm for her own personal use and failing to properly register with the Ohio Attorney General's office.
58. Defendant Lisa Gordon violated her fiduciary duties to preserve the charitable trust property of Defendant Frog Pond Farm for the intended charitable trust purposes and to properly manage and maintain the charitable trust property for the benefit of the charitable beneficiaries.
59. Defendant Lisa Gordon has breached her fiduciary duties, resulting in loss and other damages.
60. The Ohio Attorney General, in his role as *parens patriae*, protects charitable trusts and their beneficiaries who should have benefited from charitable trust assets, including the assets raised or held on behalf of the charitable beneficiaries.
61. Because Defendant Lisa Gordon has proven incapable of appropriately managing and distributing charitable trust assets and solicitation proceeds collected and held for charitable

purposes, the Ohio Attorney General is entitled to an order imposing a constructive trust over all proceeds raised or collected by Defendants for charitable purposes, including all amounts unjustly retained by Defendants, and an order enforcing such constructive trust. Moreover, the Ohio Attorney General requests that all assets and proceeds under constructive trust be transferred to the Ohio Attorney General to be distributed to another charity with a similar charitable purpose as Defendant Frog Pond Farm.

COUNT THIRTEEN
COMMON LAW FRAUD

62. Defendant Lisa Gordon made false or misleading statements and representations to, or had reason to know of false and misleading statements and representations made to, donors, the Ohio Attorney General, the State of Ohio, and other persons.
63. Defendant Lisa Gordon stated in a letter to the Ohio Attorney General dated April 3, 2013, "Initially I provided all our incoming and outgoing Paypal and checking information."
64. Defendant Lisa Gordon stated in a letter to the Ohio Attorney General dated April 3, 2013, "I provided 2008-2011 financials to you via the 2 means we collect funds (sic). These are our account via PayPal and our business registered checking account."
65. During the Examination Under Oath held on June 24, 2013 Defendant Lisa Gordon was asked, regarding the letter sent to the Ohio Attorney General on April 3, 2013, "You state here you provided all of your incoming and outgoing PayPal and checking information; is that correct?" to which Defendant Lisa Gordon responded "Yes." Defendant Lisa Gordon was further asked, "And you stated previously you did provide all that information to us?" to which Defendant Lisa Gordon responded "Yes."

66. During the Examination Under Oath held on June 24, 2013 Defendant Lisa Gordon was asked "Have you personally ever received any monetary payments from Frog Pond?" to which she responded "No."
67. During the Examination Under Oath held on June 24, 2013 Defendant Lisa Gordon was asked "Have you ever used the charity's money for anything unrelated to the charity?" to which she responded "No."
68. During the Examination Under Oath held on June 24, 2013 Defendant Lisa Gordon admitted to using the charity's PayPal account and bank account for numerous personal transactions including, *inter alia*, restaurants, Coconis Furniture, Victoria's Secret, Hotel Breakers, Cedar Point, Rue 21, and The Shoe Department.
69. Defendant's statements and misrepresentations were purposeful, willful, wanton, and/or reckless and intended to mislead donors, the Ohio Attorney General, the State of Ohio, and other persons.
70. Donors, the Ohio Attorney General, the State of Ohio, and other persons relied on those false or misleading statements and representations and have suffered damages.

COUNT FOURTEEN
CONVERSION

71. Ohio courts recognize the common law cause of action known as conversion. Conversion is the wrongfully exerted control over the personal property of another in a manner inconsistent with the owner's rights. An action in conversion may exist even when the possessor of the property did not come into possession wrongfully, but when the possessor subsequently uses the property wrongfully.

72. Defendant Lisa Gordon personally benefitted at the expense of the charitable beneficiaries by taking proceeds collected for charitable purposes and using that money for her own personal and other unlawful purposes.
73. Defendant's conduct constitutes conversion for which she is liable to pay damages in an amount not yet determined as punitive damages and as restitution for loss of property collected or held on behalf of charitable purposes.
74. The Ohio Attorney General is entitled to an order of this Court disgorging all amounts wrongfully retained by Defendant.
75. The Ohio Attorney General, in his role as *parens patriae*, protects charitable trusts and their beneficiaries who should have benefited from charitable trust assets, including the assets raised or held on behalf of the charitable beneficiaries.
76. Because Defendant has proven incapable of appropriately managing and distributing charitable trust assets and solicitation proceeds collected and held for charitable purposes, the Ohio Attorney General is entitled to an order imposing a constructive trust over all proceeds raised or collected by Defendants for charitable purposes, including all amounts unjustly retained by Defendants, and an order enforcing such constructive trust. Moreover, the Ohio Attorney General requests that all assets and proceeds under constructive trust be transferred to the Ohio Attorney General to be distributed to another charity with a similar charitable purpose as Defendant Frog Pond Farm.

COUNT FIFTEEN
UNJUST ENRICHMENT

77. When a party would be unjustly enriched by wrongly retaining property, the Court may impose a constructive trust upon that party, placing upon the party the duty in equity to convey the property to its rightful owner.

78. Ohio courts recognize the equitable remedy of constructive trust, and will apply the doctrine to prevent unjust enrichment of those who abuse their role as trustees.
79. Defendant Lisa Gordon personally benefited at the expense of the charitable beneficiaries by taking proceeds collected for charitable purposes and using that money for her personal and unlawful purposes.
80. As a result of Defendant's conduct, Defendant was unjustly enriched when she retained charitable proceeds at the expense of charitable beneficiaries.
81. Because Defendants have been unjustly enriched, the Ohio Attorney General is entitled to an order of this Court disgorging all amounts unjustly retained by Defendants.
82. The Ohio Attorney General, in his role as *parens patriae*, protects charitable trusts and their beneficiaries who should have benefited from charitable trust assets, including the assets raised or held on behalf of the charitable beneficiaries.
83. Because Defendant Lisa Gordon has proven incapable of appropriately managing and distributing charitable trust assets and solicitation proceeds collected and held for charitable purposes, the Ohio Attorney General is entitled to an order imposing a constructive trust over all proceeds raised or collected by Defendants for charitable purposes, including all amounts unjustly retained by Defendants, and an order enforcing such constructive trust. Moreover, the Ohio Attorney General requests that all assets and proceeds under constructive trust be transferred to the Ohio Attorney General to be distributed to another charity with a similar charitable purpose as Defendant Frog Pond Farm.

COUNT SIXTEEN
REFORMATION OF CHARITABLE TRUST

84. Ohio courts recognize the equitable doctrine of *cy pres* and courts will apply the doctrine when: (A) there is a viable charitable trust; (B) the donor evidenced a general charitable

intent on establishing the trust; and (C) it has become impossible or impractical to carry out the specific purposes or terms of the trust.

85. Ohio case law recognizes the equitable doctrine of deviation. Courts may apply the doctrine when it deems necessary or highly desirable in order to enable the trustee to perform the purposes of the trust. Courts may deviate from the terms of the trust if the provisions have become so restrictive as to impair accomplishment of the trust purposes.
86. Defendants solicited for charitable purposes and manifested an intention to create a charitable trust in favor of the charitable beneficiaries. As such, the funds raised or collected by Defendants may be used only for the charitable purposes set forth in the terms of the trust. Additionally, all charitable proceeds unjustly or illegally retained by Defendants are subject to the same charitable trust.
87. In donating money to Defendants for the benefit of charitable beneficiaries, the public manifested the intent to create a charitable trust in favor of the charitable beneficiaries. As such, the funds raised or collected by Defendants may be used only for the charitable purposes set forth in the terms of the trust. Additionally, all charitable proceeds unjustly or illegally retained by Defendants are subject to the same charitable trust.
88. The specific purposes and/or specific terms of the charitable trust have become impossible or impractical to perform due to the actions or inactions of Defendants.
89. As an example of the frustration of purpose, Defendant Lisa Gordon has taken assets and proceeds under trust, or has held such assets, and has used them for her personal or other unlawful purposes.

90. The Ohio Attorney General is entitled to an order reforming the terms of the charitable trust, in order to most nearly fulfill the purposes of the charitable trust in accordance with the doctrine of *cy pres* or deviation.

91. Because Defendant Lisa Gordon has proven incapable of appropriately managing and distributing charitable trust assets and solicitation proceeds collected on behalf of charitable purposes, the Ohio Attorney General requests an order reforming the charitable trust, dissolving Frog Pond Farm, Inc., removing the current trustees from office, and distributing all assets and proceeds to another charity with a similar charitable purpose as Defendant Frog Pond Farm.

COUNT SEVENTEEN
NUISANCE

92. R.C. § 1716.14(B) states that the act of soliciting contributions for any charitable organization or charitable purpose without complying with the requirements of Chapter 1716 or any rule adopted thereunder is a nuisance.

93. Defendants' actions constitute a nuisance pursuant to R.C. § 1716.14(B) subject to abatement. The Ohio Attorney General is entitled to an injunction prohibiting further solicitations by Defendants.

PRAYER FOR RELIEF

WHEREFORE, pursuant to his statutory and common law authority, the Ohio Attorney General respectfully requests the Court to grant the following relief:


- A. Grant a permanent injunction and perpetually enjoin Defendant Lisa Gordon from holding any position as an officer, trustee, or employee of any nonprofit corporation or association in the state of Ohio;

- B. Grant a preliminary and permanent injunction prohibiting Defendants from soliciting in the state of Ohio for charitable purposes;
- C. Impose a constructive trust over all assets unjustly or illegally retained by Defendants and order Defendants to disgorge all assets held under that constructive trust to the Ohio Attorney General for distribution to another charity with a similar charitable purpose as Defendant Frog Pond Farm;
- D. Order Defendants to pay restitution and compensatory damages, including interest, for all amounts unjustly or illegally retained by Defendants, to the Ohio Attorney General for distribution to another charity with a similar charitable purpose as Defendant Frog Pond Farm;
- E. Declare the terms of the charitable trust, and enter an order enforcing those terms in a manner consistent with this Complaint including dissolving Frog Pond Farm, Inc., removing the current trustees from office, and distributing all assets and proceeds to the Ohio Attorney General for distribution to another charity with a similar charitable purpose as Defendant Frog Pond Farm;
- F. Reform the charitable trust in accordance with the doctrine of *cy pres* or deviation, including dissolving Frog Pond Farm, Inc., removing the current trustees from office, and distributing all assets and proceeds to the Ohio Attorney General for distribution to another charity with a similar charitable purpose as Defendant Frog Pond Farm;
- G. Award punitive damages in an amount that is just and appropriate for Defendants' malfeasance;

- H. Award Plaintiff, Ohio Attorney General, reasonable attorney fees, expenses, and costs of investigation and litigation in accordance with R.C. § 1716.16;
- I. Impose a civil penalty against Defendants of up to \$10,000.00 for each violation of R.C. Chapter 1716 stated in this Complaint, pursuant to R.C. § 1716.16(B);
- J. Impose a civil penalty against Defendants of up to \$10,000.00 for each violation of R.C. § 109.26 stated in this Complaint, pursuant to R.C. § 109.99(A);
- K. Award joint and several liability against Defendants;
- L. Grant Plaintiff, Ohio Attorney General, other relief as the Court deems proper and necessary.

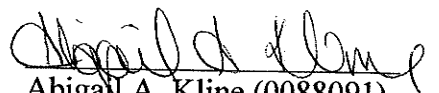
Very respectfully submitted,

MIKE DEWINE
Ohio Attorney General


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JURY DEMAND

Plaintiff Ohio Attorney General, by and through counsel, hereby demands a trial by jury on all issues so triable.


Abigail A. Kline (0088091)
Assistant Attorney General