

IN THE COURT OF COMMON PLEAS
TRUMBULL COUNTY, OHIO

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

AGREED ENTRY AND ORDER OF
PAUL GROSSI



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The Ohio Attorney General filed this action on April 27, 2012 alleging that Defendant Paul Grossi violated the Ohio Charitable Organizations Act, R.C. § 1716.01 *et seq.* The Attorney General alleged that Defendant Paul Grossi 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 Paul Grossi 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 Paul Grossi have negotiated and agreed to the terms of this Agreed Entry and Order. Based upon, among other things, the Attorney General's Complaint, 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 Paul Grossi agrees that he will not hold any position as a volunteer, officer, trustee, employee, representative, independent contractor, or agent of any charitable organization in the State of Ohio following the date this Agreed Entry and Order is signed.
2. Defendant Paul Grossi agrees that he 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 volunteer, officer, trustee, employee, representative, independent contractor, or agent of an organization; or 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.

3. Defendant Paul Grossi shall pay the sum of \$3,000.00 in 60 monthly installments of \$50.00 to the Office of the Ohio Attorney General. The payment shall be received by the Office of the Attorney General on or before the first day of each month and shall begin immediately upon the execution of this Agreed Entry and Order. The payment shall be made by delivering to the to the Office of the Attorney General, Charitable Law Section, at 150 East Gay Street, 23rd Floor, Columbus, Ohio, 43215, Attn: Dionne DeNunzio, a certified check or money order, 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.

4. If Defendant Paul Grossi's net worth meets or exceeds \$500,000.00, Defendant Paul Grossi shall immediately pay the total unpaid balance of \$3,000.00 to the Office of the Ohio Attorney General. The payment shall be made by delivering to the Office of the Attorney General, Charitable Law Section, at 150 East Gay Street, 23rd Floor, Columbus, Ohio, 43215, Attn: Dionne DeNunzio, a certified check or money order, 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.

5. If Defendant Paul Grossi fails to comply with the conditions in Paragraphs One, Two, Three, or Four above, the Attorney General may file a Motion to show cause why Defendant Paul Grossi should not be held in contempt. In such case, the Court will conduct an evidentiary hearing on the Attorney General's Motion. If the Attorney General demonstrates

after a full evidentiary hearing by preponderance of the evidence that Defendant Paul Grossi through his own actions or through the actions of his agents, representatives, or assigns violated Paragraphs One, Two, Three, or Four above, the Court will order the total unpaid balance of \$3,000.00 to be due immediately. In any such action for Contempt of Court, the Attorney General need not establish whether or not any damages were appropriately awardable under the claims set forth in the Complaint.

6. In the event that the Attorney General obtains judgment through contempt proceedings, all funds recovered under such judgment shall be transferred to the Attorney General for redistribution to nonprofit organizations that support patients with breast cancer.

7. The Attorney General shall not attempt to obtain judgment from Defendant Paul Grossi for the liabilities of Defendant PJG Enterprises, LLC.

8. 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.

9. This Agreed Entry and Order constitutes the conclusion of all claims between the Attorney General and Defendant Paul Grossi in this case. This Court retains jurisdiction to enforce the terms of this Agreed Entry and Order.

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

11. 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: _____



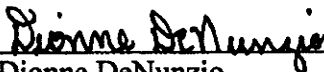
JUDGE ANDREW LOGAN

AGREED:




PAUL GROSSI

MIKE DEWINE
OHIO ATTORNEY GENERAL



Dionne DeNunzio
Associate Assistant Attorney General
Charitable Law Section
150 E. Gay Street, 23rd Floor
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FILED
COURT OF COMMON PLEAS
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TRUMBULL COUNTY, OH
KAREN INFANTE ALLEN, CLERK