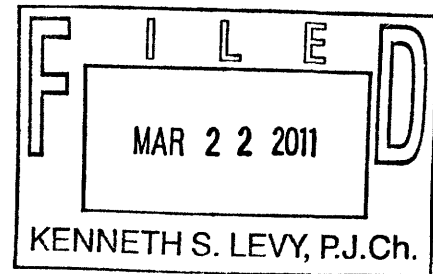


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SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION: GENERAL
EQUITY
ESSEX COUNTY
DOCKET NO. ESX-C-276-10

PAULA T. DOW,
Attorney General of
New Jersey, and
THOMAS R. CALCAGNI,
Acting Director of the New Jersey
Division of Consumer Affairs,

Plaintiffs,

v.

SHARON CATALANO-CRUMB,
individually and as a trustee
of NJ Horse Angels a/k/a
www.njhorseangelsrescue.org a/k/a
NJ Horse Angels Rescue a/k/a NJ
Killpen Horses . . . Horse Angels
of Facebook a/k/a Camelot Auction
Horse Angels a/k/a The Forgotten
Angels;
FRANK WIKOFF,
individually and as a trustee
of NJ Horse Angels a/k/a
www.njhorseangelsrescue.org a/k/a
NJ Horse Angels Rescue a/k/a NJ
Killpen Horses . . . Horse Angels
of Facebook a/k/a Camelot Auction
Horse Angels a/k/a The Forgotten
Angels; and
NJ HORSE ANGELS A/K/A
WWW.NJHORSEANGELSRESCUE.ORG A/K/A
NJ HORSE ANGELS RESCUE A/K/A NJ
KILLPEN HORSES . . . HORSE ANGELS

CIVIL ACTION

FINAL JUDGMENT AND CONSENT
ORDER AS TO SHARON
CATALANO-CRUMB, FRANK
WIKOFF, AND NJ HORSE ANGELS
A/K/A
WWW.NJHORSEANGELSRESCUE.ORG
A/K/A NJ HORSE ANGELS
RESCUE A/K/A NJ KILLPEN
HORSES . . . HORSE ANGELS
OF FACEBOOK A/K/A CAMELOT
AUCTION HORSE ANGELS A/K/A
THE FORGOTTEN ANGELS

OF FACEBOOK A/K/A CAMELOT AUCTION
HORSE ANGELS A/K/A THE FORGOTTEN
ANGELS,
a New Jersey non-profit
corporation,

Defendants.

This matter was presented to the Court by Paula T. Dow, Attorney General of New Jersey, and the Division of Consumer Affairs, Office of Consumer Protection ("Division") (collectively, "Plaintiffs") (Deputy Attorneys General Anna M. Lascurain and Elizabeth R. Lash, appearing), pursuant to the New Jersey Charitable Registration and Investigation Act, N.J.S.A. 45:17A, et seq. ("Charities Act"). Defendants Sharon Catalano-Crumb ("Crumb"), Frank Wikoff ("Wikoff"), and NJ Horse Angels a/k/a www.njhorseangelsrescue.org a/k/a NJ Horse Angels Rescue a/k/a NJ Killpen Horses . . . Horse Angels of Facebook a/k/a Camelot Auction Horse Angels a/k/a The Forgotten Angels ("NJ Horse Angels") (collectively, "Defendants"), through their counsel, Scott M. Wilhelm, Esq., of the Law Offices of Winegar, Wilhelm, Glynn & Roemersma, have agreed to resolve any and all issues in controversy in this action, and herein, on the terms set forth in this Final Judgment and Consent Order, which terms have, with the consent of the Acting Director of the Division ("Acting Director") and the Defendants, been reviewed and approved by the Honorable Kenneth S. Levy, P.J.Ch., as confirmed by the entering of this Final Judgment and Consent Order.

The Acting Director makes the following findings of fact and conclusions of law:

1. NJ Horse Angels is a New Jersey non-profit corporation, incorporated on February 22, 2010, with a principal place of business at 185 Washington Street, Phillipsburg, New Jersey. NJ Horse Angels never registered as a charitable organization with the Attorney General. NJ Horse Angels was not exempt from registration. At all relevant times, NJ Horse Angels' principal place of business was located at Crumb's residence.

2. Crumb resides in Phillipsburg, New Jersey and is a trustee of NJ Horse Angels.

3. Frank Wikoff ("Wikoff") is a trustee of NJ Horse Angels and is Crumb's live-in boyfriend. Wikoff is a convicted felon. Wikoff resides with Crumb in Phillipsburg, New Jersey.

4. Between at least September 19, 2009 and at least August 18, 2010, Crumb and NJ Horse Angels solicited charitable contributions, purportedly to rescue horses from being sold at auctions and sent to slaughterhouses. This type of rescue is known as "bailing."

5. Crumb and NJ Horse Angels also solicited charitable contributions for rescued horses' transportation, food, board, and care until new private owners, if any, could be found for these horses.

6. Between at least September 19, 2009 and at least August 18, 2010, Crumb and NJ Horse Angels solicited contributions on a weekly basis.

7. Crumb and NJ Horse Angels primarily bailed horses from Camelot Auction Company ("Camelot"), located in Cranbury, New Jersey. Crumb and NJ Horse Angels purported to rescue horses only if they were still unsold after Camelot's weekly auction and had been placed in pen #10 (aka "feedlot" or "killpen") to be shipped out to slaughter. However, there were occasions when horses were purchased on behalf of NJ Horse Angels during Camelot's weekly auction.

8. Crumb and NJ Horse Angels solicited charitable contributions through the website, www.facebook.com ("Facebook"). Crumb and NJ Horse Angels solicited charitable contributions on Facebook through at least three group pages: "NJ Killpen Horses . . . Horse Angels of Facebook," "Camelot Auction Horse Angels," and "The Forgotten Angels."

9. Crumb and NJ Horse Angels also solicited charitable contributions through a website, www.njhorseangelsrescue.org ("NJ Horse Angels Rescue website"), and through a blog, www.njhorseangels.blogspot ("NJ Horse Angels blog").

10. Crumb and NJ Horse Angels represented to at least one individual that no one associated with NJ Horse Angels, including Crumb, received monetary compensation.

11. Between at least September 19, 2009 and August 18, 2010, NJ Horse Angels, through one or more of its Facebook groups, had at least 4,990 Facebook members. Crumb and NJ Horse Angels requested that its members solicit charitable contributions through members' own pages or other Facebook

groups (known as "cross-posting"). Other individuals could also access NJ Horse Angels Facebook group pages via group members' access to the NJ Horse Angels Facebook groups. Such cross-posting and access to the NJ Horse Angels' Facebook group pages permitted, at times, the solicitations to reach an even larger audience than 4,990 Friends.

12. Crumb and NJ Horse Angels encouraged donors to contribute through PayPal.

13. Crumb owned and operated at least two different PayPal accounts ("PayPal Accounts").

14. Crumb and NJ Horse Angels raised charitable contributions through the PayPal Accounts.

15. On October 25, 2007, Crumb opened a PayPal account associated with the e-mail address: working4them@gmail.com ("Working4them@gmail.com PayPal Account"). From November 28, 2009 to March 7, 2010, Crumb used sharonsfun21@yahoo.com as an alias e-mail address on the Working4them@gmail.com PayPal Account. As of September 12, 2010, the Working4them@gmail.com PayPal Account balance was \$573.01.

16. On March 7, 2010, Crumb opened a separate PayPal account associated with sharonsfun21@yahoo.com ("Sharonsfun21@yahoo.com PayPal Account"). On or about August 1, 2010, Crumb used sharonsfun21@gmail.com as an alternate e-mail address on the Sharonsfun21@yahoo.com PayPal Account. As of September 12, 2010, the Sharonsfun21@yahoo.com PayPal Account balance was \$205.37.

17. On February 28, 2008, Crumb and Wikoff opened a combined personal checking and savings account with the Ingersoll-Rand Company ("IRCO") Federal Credit Union ("Personal Account"). Wikoff was removed as a signatory from the Personal Account on October 23, 2008. On August 10, 2009, Crumb linked the Personal Account to the Working4them@gmail.com PayPal Account. On March 7, 2010, Crumb linked the Personal Account to the Sharonsfun21@yahoo.com PayPal Account. On May 20, 2010, "Christopher Crumb NJ State Prison" was added as a "web gift address" to the Sharonsfun21@yahoo.com PayPal Account. Christopher Crumb is Crumb's son, who is serving a life sentence at Trenton State prison. As of September 30, 2010, the Personal Account balance was \$4,687.24.

18. On March 2, 2010, Crumb established an Ingersoll-Rand Company ("IRCO") Federal Credit Union business checking and savings account in the names of NJ Horse Angels and Crumb ("Business Account"). Crumb was the sole signatory on the Business Account. Crumb signed as President of NJ Horse Angels on the Business Account. On March 2, 2010, Crumb upgraded the Working4them@gmail.com PayPal Account to a Business PayPal Account as a nonprofit charity. On March 2, 2010, Crumb linked the Business Account to the Working4them@gmail.com PayPal Account. As of September 30, 2010, the Business Account balance was \$3,765.96.

19. Between September 19, 2009 and September 12, 2010, Crumb and NJ Horse Angels raised at least \$145,132.08. Crumb

and NJ Horse Angels raised charitable contributions from approximately 2,328 PayPal transactions.

20. NJ Horse Angels' stated charitable purpose was to raise funds to bail horses, and for rescued horses' transportation, food, board, and care until new private owners, if any, could be found for these horses.

21. NJ Horse Angels spent some charitable contributions on items such as bail, transport, feed, and board, among others.

22. Crumb also commingled charitable contributions in her Personal Account. Crumb expended charitable contributions in a manner inconsistent with the stated charitable purpose of NJ Horse Angels by misappropriating at least \$47,897.84 of the charitable contributions.

23. Between March 8, 2010 and June 30, 2010, Crumb transferred charitable contributions from the Working4them@gmail.com PayPal Account to the Sharonsfun21@yahoo.com PayPal Account.

24. Between March 17, 2010, and July 4, 2010, Crumb transferred charitable contributions from the Sharonsfun21@yahoo.com PayPal Account back to the Working4them@gmail.com PayPal Account.

25. Crumb spent charitable contributions on Atlantic City casinos, shopping, phone bills, dining out, and cash withdrawals. Crumb spent charitable contributions on a Toby Keith concert, a TrySensa.com weight loss program, a Sylvan, Inc. aluminum dog wheelchair, cable television service, home

heating oil, a storage unit, hotels, magazine subscriptions, USPS service, and other miscellaneous items. Crumb spent charitable contributions on her own personal horse and bought jewelry with the proceeds of charitable contributions for Wikoff. Crumb transferred funds to and paid for prepaid phone cards for her son, Christopher Crumb. Crumb also transferred funds to Baron Roesler, her son's friend and a parolee.

26. In addition, on at least one occasion, Crumb and NJ Horse Angels specifically solicited and raised funds for veterinary care for rescued horses.

27. On at least one occasion, Crumb and NJ Horse Angels refused to pay for veterinary care, despite having solicited and raised funds for veterinary care, purportedly because NJ Horse Angels had no funds available to pay for veterinary care.

28. Crumb and NJ Horse Angels made false and misleading statements in connection with soliciting charitable contributions for NJ Horse Angels' rescues.

29. Crumb and NJ Horse Angels misrepresented to at least one individual that neither Crumb nor anyone else associated with NJ Horse Angels received or took any compensation.

30. Crumb and NJ Horse Angels, at times, solicited donations to bail horses that had already been bailed by private buyers.

31. Crumb and NJ Horse Angels, at times, solicited contributions to bail horses when sufficient contributions had already been made to bail the horses.

32. Charitable contributions were solicited to bail a particular horse but were not used for that purpose.

33. Crumb and NJ Horse Angels omitted material facts in connection with soliciting charitable contributions for NJ Horse Angels' rescues.

34. Crumb and NJ Horse Angels omitted to inform donors, when soliciting contributions, that Crumb used charitable contributions in part for her personal benefit and that of other individuals.

35. Crumb and NJ Horse Angels, in soliciting charitable contributions, omitted to notify donors when sufficient donations had been raised to bail horses.

36. Crumb and NJ Horse Angels, in soliciting charitable contributions, failed to notify donors when other individuals had bailed the horses.

37. In some instances, Crumb and NJ Horse Angels deleted Facebook posts notifying members that horses had already been bailed by other individuals.

38. Crumb and NJ Horse Angels failed to disclose to donors information about NJ Horse Angels' fund raising practices.

39. Crumb and NJ Horse Angels failed to disclose to donors the use of NJ Horse Angels' charitable contributions.

40. In some instances, Crumb and NJ Horse Angels ignored Facebook postings which questioned and/or disputed the accuracy of information about NJ Horse Angels' fundraising practices.

41. In some instances, Crumb and/or NJ Horse Angels blocked individuals from NJ Horse Angels' Facebook groups and/or from contacting Crumb through Facebook after these individuals questioned and/or disputed the accuracy of information about NJ Horse Angels' fundraising practices.

42. NJ Horse Angels failed to file any charities registration statement or exemption with the Attorney General.

43. Crumb and NJ Horse Angels failed to keep complete and accurate records of NJ Horse Angels' activities.

44. Under N.J.S.A. 45:17A-26, charitable organizations are exempt from registering with the Attorney General if they raise \$10,000 or less per fiscal year and do not compensate persons soliciting contributions.

45. Under N.J.S.A. 45:17A-23(a), charitable organizations that are not exempt from registration must file registration statements with the Attorney General.

46. Under N.J.S.A. 45:17A-24(a), charitable organizations not exempt from registration that raise in excess of \$25,000 in gross contributions during a fiscal year or compensate persons soliciting contributions must file a long form registration statement.

47. NJ Horse Angels was not exempt from registration as a charitable organization with the Attorney General.

48. NJ Horse Angels raised more than \$25,000 during a fiscal year.

49. NJ Horse Angels was required to file a long form registration statement.

50. NJ Horse Angels failed to file a long form registration statement with the Attorney General.

51. NJ Horse Angels' failure to register and trustees Crumb and Wikoff's failure to ensure that NJ Horse Angels registered with the Attorney General is a violation of N.J.S.A. 45:17A-23(a).

52. NJ Horse Angels' failure to file a long form registration statement and trustees Crumb and Wikoff's failure to ensure that NJ Horse Angels filed a long form registration statement is in violation of N.J.S.A. 45:17A-24(a).

53. N.J.S.A. 45:17A-23(b) forbids charitable organizations from soliciting contributions or permitting contributions to be solicited on their behalf before the Attorney General has had the opportunity to review their registration statements.

54. NJ Horse Angels and Crumb solicited, or permitted solicitations on NJ Horse Angels' behalf, without NJ Horse Angels being a registered charitable organization. Trustees Crumb and Wikoff failed to ensure that NJ Horse Angels filed a registration form for NJ Horse Angels with the Attorney General prior to soliciting contributions. Each solicitation while unregistered is a violation of N.J.S.A. 45:17A-23(b).

55. Under N.J.S.A. 45:17A-31, charitable organizations are required to keep complete and accurate records of their fundraising activities in New Jersey. NJ Horse Angels failed to

maintain complete and accurate records of its fundraising activities in New Jersey.

56. The failure by NJ Horse Angels to maintain complete and accurate records of NJ Horse Angels' fundraising activities in New Jersey and trustees Crumb and Wikoff's failure to ensure NJ Horse Angels' compliance constitutes a violation of N.J.S.A. 45:17A-31.

57. NJ Horse Angels and Crumb, individually and as a trustee, made untruthful written statements and/or omitted material facts, in violation of N.J.S.A. 45:17A-32(a), (c)(1). Trustee Wikoff failed to prevent Crumb and NJ Horse Angels from making untruthful statements and/or omitting to state material facts.

58. Under N.J.S.A. 45:17A-32(a), any oral or written statement made by or on behalf of a charitable organization shall be truthful.

59. Under N.J.S.A. 45:17A-32(c)(1), it is unlawful for charitable organizations, in soliciting charitable contributions, to misrepresent the purpose or nature of the charitable institution or the purpose or beneficiary of a solicitation, or to solicit contributions for a purpose other than the stated charitable purpose, or to fail to disclose any material fact.

60. Crumb and NJ Horse Angels' false and misleading written and/or oral statements included, but were not limited to:

a. NJ Horse Angels needed contributions to bail particular horses when the horses had already been purchased by a private buyer;

b. NJ Horse Angels needed contributions to bail particular horses when sufficient contributions had already been made to bail those horses;

c. charitable contributions were solicited to bail a particular horse but were not used for that purpose; and

d. no one associated with NJ Horse Angels received compensation.

61. Crumb and NJ Horse Angels omitted to state the following material facts to donors:

a. the proceeds of charitable contributions raised by NJ Horse Angels would be used for Crumb's personal benefit and that of other individuals;

b. in some instances, sufficient donations had been raised to bail particular horses intended for rescue;

c. in some instances, other individuals or organizations had already bailed the particular horses intended for rescue;

d. information about NJ Horse Angels' fund raising practices; and

e. the use of the charitable contributions raised by NJ Horse Angels.

62. Each violation of N.J.S.A. 45:17A-32(a), (c) (1) is a separate violation.

63. Under N.J.S.A. 45:17A-32(c)(1), it is unlawful for charitable organizations, in soliciting funds, to expend contributions in a manner inconsistent with their stated charitable purposes.

64. NJ Horse Angels' stated charitable purpose was to raise charitable contributions for horses' bail, transport, board, and care.

65. NJ Horse Angels and Crumb solicited charitable contributions for horses' bail, transport, board, and care.

66. Crumb, through NJ Horse Angels, used at least \$47,897.84 of charitable contributions for personal expenses rather than on NJ Horse Angels' stated charitable purpose.

67. Each expenditure of charitable contributions in a manner inconsistent with NJ Horse Angels' stated charitable purpose by NJ Horse Angels, Crumb, individually and as a trustee, and trustee Wikoff constitutes a separate violation of N.J.S.A. 45:17A-32(c)(1).

68. Under N.J.S.A. 45:17A-32(b), a charitable organization must establish and exercise control over fund raising activities conducted for its benefit.

69. NJ Horse Angels, Crumb, individually and as a trustee, and trustee Wikoff failed to establish and exercise control over NJ Horse Angels' fundraising activities by failing to ensure that all the charitable contributions solicited and collected on behalf of NJ Horse Angels were used for NJ Horse Angels.

70. The failure to establish and exercise control over NJ Horse Angels' fundraising activities constitutes a separate violation of N.J.S.A. 45:17A-32(b).

71. Wikoff received items of value which can be traced to the use of charitable contributions, but he had no legal right to receive such benefits.

72. The charitable contributions belonged to the donors to be used for NJ Horse Angels and/or returned to them. Therefore, Wikoff has been unjustly enriched.

73. Wikoff's unjust enrichment is cause for disgorgement of the items purchased for him using charitable contributions. Now, for good cause shown,

IT IS, on this 22nd day of March 2018 [✓] ORDERED AND
AGREED:

a. Defendants NJ Horse Angels, Crumb, and Wikoff engaged in the acts and practices alleged above;

b. Such acts and practices constituted violations of the Charities Act;

c. Defendants Crumb, Wikoff, and NJ Horse Angels, individually and by or through any corporation, business entity, and person acting under their control or direction, are permanently enjoined from violating the Charities Act;

d. Defendants Crumb, Wikoff, and NJ Horse Angels, individually and by or through any corporation, business entity, and person acting under their control or direction, are

permanently enjoined from soliciting charitable contributions, from or within the State of New Jersey;

e. Defendants Crumb and Wikoff, individually and by or through any corporation, business entity, or person acting under their control or direction, are permanently enjoined from acting as stockholders, employees, officers, directors, principals, trustees, owners, shareholders, founders, managers, agents, servants, volunteers, representatives, independent contractors, independent paid fund raisers, or solicitors of a charitable organization from or within the State of New Jersey;

f. Defendant NJ Horse Angels individually, and by or through any other corporation, business entity, stockholder, employee, officer, director, principal, trustee, owner, shareholder, founder, manager, agent, servant, volunteer, representative, independent contractor, or person under its control or direction, is permanently enjoined from acting as a charitable organization, independent paid fund raiser, or solicitor, from or within the State of New Jersey;

g. Defendants Crumb, Wikoff, and NJ Horse Angels are permanently enjoined from making any written or oral advertisements or solicitations, referring or relating to NJ Horse Angels or other charitable organizations. This includes all Internet postings referring or relating to NJ Horse Angels, including, but not limited to, websites, blogs, and Facebook groups;

h. Defendants Crumb, Wikoff, and NJ Horse Angels shall remove or cause to be removed from the Internet all websites, blogs, and Facebook groups referring or relating to NJ Horse Angels, including, but not limited to, Facebook groups "NJ Killpen Horses . . . Horse Angels of Facebook," "Camelot Auction Horse Angels," and "The Forgotten Angels," www.njhorseangelsrescue.org, and www.njhorseangels.blogspot;

i. Any person with actual or constructive notice of this Order who aids, abets, counsels, commands or instructs any person or entity to perform any act prohibited by the order shall be subject to punishment;

j. Defendants Crumb, Wikoff, and NJ Horse Angels are jointly and severally assessed civil monetary penalties for each separate act of violating the Charities Act in accordance with N.J.S.A. 45:17A-33(d) in the amount of \$500,625;

k. Defendants Crumb, Wikoff, and NJ Horse Angels are jointly and severally assessed costs in the amount of \$23,299.53;

l. Defendants Crumb, Wikoff, and NJ Horse Angels shall restore in the amount of \$57,129.42 any moneys and real or personal property acquired by means of any practice alleged herein to be unlawful and found to be unlawful, pursuant to N.J.S.A. 45:17A-33, that was contributed for the express purposes of rescuing horses and/or any other charitable purpose or objective relating to the rescue of horses, including, but not limited to, bailment, transport, quarantine, boarding, food,

and veterinary care, and that were not apportioned to such express purpose, or other donations that were allocated. Such funds shall be restored to the Division to be donated to another registered horse rescue organization that is a qualified 501(c)(3) organization;

m. Within 60 days, defendants Crumb, Wikoff, and/or NJ Horse Angels shall turn over the balance of funds in any accounts currently frozen under the Court's December 13, 2010 Order entering restraints and ancillary relief against Defendants including, but not limited to, the Personal Account, the Business Account, the PayPal Accounts, and Defendants' PNC accounts. These funds will be applied to reduce the total amount of restoration due;

n. The Acting Director shall transfer the restored funds in the amount of \$57,129.42 to a registered horse rescue organization that is a qualified 501(c)(3) organization ("Organization"), pursuant to N.J.S.A. 45:17A-33(e). The Acting Director may transfer restored funds at intervals to the Organization without waiting for the full amount of \$57,129.42 to be received by the Division;

o. Payment of the penalty, restitution, and costs shall be paid by defendants in accordance with the following schedule:

1. \$2,500 within 10 days of the entry of this Final Judgment and Consent Order. This payment shall be applied to the balance of the penalty;

2. \$2,500 within 90 days of the entry of this Final Judgment and Consent Order. This payment shall be applied to the balance of the penalty;

3. \$400 a month thereafter for 201 months, and any balance remaining thereafter of \$80,428.95 for restitution and costs, subject to paragraph (m). These payments shall be applied to the balance of the restoration and costs;

p. Payment shall be made by wire transfer or certified or cashier's check made payable to "New Jersey Division of Consumer Affairs" and shall be forwarded to:

Larry Biondo, Supervising Investigator
Office of Consumer Protection
Division of Consumer Affairs
124 Halsey Street - 7th Floor
P.O. Box 45025
Newark, NJ 07101

q. For a period of 5 years from the date of entry of this Final Judgment and Consent Order, the unpaid balance of the civil penalties assessed pursuant to N.J.S.A. 45:17A-33(d), shall be suspended and automatically vacated at the end of that period, provided that:

1. Defendants Crumb, Wikoff, and NJ Horse Angels comply in all material respects with the restraints and conditions set forth in this Final Judgment and Consent Order;

2. Defendants Crumb, Wikoff, and NJ Horse Angels timely make all payments referenced in the preceding paragraph;

3. The Division does not uncover information that defendants Crumb, Wikoff, or NJ Horse Angels made any material misrepresentation or material omission in disclosures concerning their knowledge of or involvement in the activities described above, or with respect to any information provided to the Division in connection with the resolution of this matter; and

4. Defendants Crumb, Wikoff, and NJ Horse Angels do not engage in any acts or practices in violation of the Charities Act;

r. In the event defendants Crumb, Wikoff, and/or NJ Horse Angels materially fail to comply with any provision of this agreement, any unpaid balance of the entire civil monetary penalty assessed (\$500,625) shall be immediately due and payable upon notice by the Division;

s. Defendants Crumb, Wikoff, and NJ Horse Angels shall not represent or imply that any act or practice hereinafter used or engaged in by defendants Crumb, Wikoff, and NJ Horse Angels has been required or approved, in whole or part, by the Attorney General of New Jersey, the Division of Consumer Affairs, the State of New Jersey or any of the State's agencies, agents, or subdivisions;

t. The parties acknowledge that for purposes of enforcement of this Final Judgment and Consent Order, New Jersey law shall govern the terms and provisions herein;

u. This Final Judgment and Consent Order constitutes the entire agreement between the parties hereto and shall bind the parties hereto and their respective officers, directors, principals, trustees, agents, employees, successors, parents, subsidiaries, affiliates and assigns;

v. In the event that any term, provision or paragraph of this Final Judgment and Consent Order is ruled invalid or unenforceable by a court of competent jurisdiction, the validity, legality and enforceability of the remaining terms, provisions and paragraphs hereof shall not in any way be affected or impaired thereby;

w. This Final Judgment and Consent Order resolves all issues outstanding between the parties regarding enforcement of and compliance with the provisions of the Charities Act that are known or are the subject of consumer complaints received by the Division at the time of the execution of this Final Judgment and Consent Order, unless the Division uncovers information that defendants Crumb, Wikoff, or NJ Horse Angels made any material misrepresentation or material omission with respect to any information provided to the Division in connection with the resolution of this matter; and

x. Nothing contained herein shall in any manner be construed to limit or affect any position that the Division or any other governmental agency may take in any future or pending action not specifically encompassed herein;

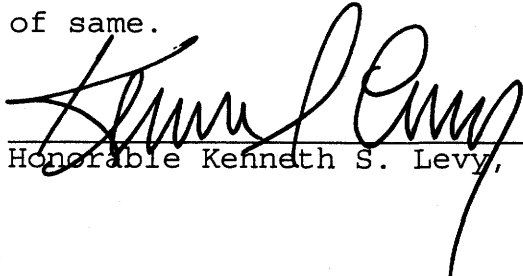
y. The parties represent that an authorized representative of each has signed this Final Judgment and Consent Order with full knowledge, understanding, and acceptance of its terms and this person has done so with authority to legally bind the respective party;

z. The entry of this Final Judgment and Consent Order has been consented to by defendants Crumb, Wikoff, and NJ Horse Angels upon advice of counsel as their own free and voluntary act and with full knowledge and understanding of the nature of the proceedings and the obligations and duties imposed upon them by this Final Judgment and Consent Order, and defendants Crumb, Wikoff, and NJ Horse Angels consent to its entry without further notice, and aver that no offer, agreement or inducements of any nature whatsoever have been made to them by the Division or the Division's employees to procure this Final Judgment and Consent Order;

aa. The parties have negotiated, jointly drafted and fully reviewed the terms of this Final Judgment and Consent Order 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 and Consent Order;

bb. This Final Judgment and Consent Order may be signed in counterparts, each of which shall be deemed an original; and

cc. Plaintiffs shall serve a copy of this Order upon defendants Crumb, Wikoff, and NJ Horse Angels within ___ days of Plaintiff's counsel's receipt of same.



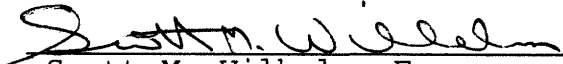
Honorable Kenneth S. Levy, P.J.Ch.

Dated: 3/22/11

[THIS SECTION INTENTIONALLY LEFT BLANK.]

I hereby consent to the form and entry of the within Final Judgment and Consent Order as to Defendants Sharon Catalano-Crumb, Frank Wikoff, and NJ Horse Angels a/k/a www.njhorseangelsrescue.org a/k/a NJ Horse Angels Rescue a/k/a NJ Killpen Horses . . . Horse Angels of Facebook a/k/a Camelot Auction Horse Angels a/k/a The Forgotten Angels

Scott M. Wilhelm, Esq.
Law Offices of Winegar, Wilhelm, Glynn & Roemersma
Counsel for Defendants Sharon Catalano-Crumb, Frank Wikoff, and NJ Horse Angels a/k/a www.njhorseangelsrescue.org a/k/a NJ Horse Angels Rescue a/k/a NJ Killpen Horses . . . Horse Angels of Facebook a/k/a Camelot Auction Horse Angels a/k/a The Forgotten Angels

By: 
Scott M. Wilhelm, Esq.

Dated: MARCH 7, 2011

PAULA T. DOW
ATTORNEY GENERAL OF NEW JERSEY

By: 
Anna M. Lascurain
Deputy Attorney General

Dated: March 10, 2011

PAULA T. DOW
ATTORNEY GENERAL OF NEW JERSEY

By: 
Elizabeth R. Lash
Deputy Attorney General

Dated: 3/10/2011