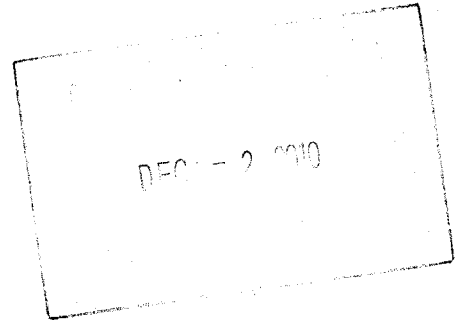


PAULA T. DOW
ATTORNEY GENERAL OF NEW JERSEY
Division of Law
124 Halsey Street - 5th Floor
P.O. Box 45029
Newark, New Jersey 07101
Attorney for Plaintiffs

By: Anna M. Lascurain
Deputy Attorney General
(973) 648-2893

Elizabeth R. Lash
Deputy Attorney General
(973) 648-4802



SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION: GENERAL
EQUITY
ESSEX COUNTY
DOCKET NO.

C 276-10

CIVIL ACTION

VERIFIED COMPLAINT

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

OF FACEBOOK A/K/A CAMELOT AUCTION
HORSE ANGELS A/K/A THE FORGOTTEN
ANGELS,

a New Jersey non-profit
corporation,

Defendants.

Plaintiffs Paula T. Dow, Attorney General of the State of New Jersey ("Attorney General"), with offices located at 124 Halsey Street, Fifth Floor, Newark, New Jersey, and Thomas R. Calcagni, Acting Director of the New Jersey Division of Consumer Affairs ("Acting Director") (collectively, "Plaintiffs"), with offices located at 124 Halsey Street, Seventh Floor, Newark, New Jersey, by way of the Verified Complaint state:

PRELIMINARY STATEMENT

1. Through the Internet, and in particular through Facebook, Sharon Catalano-Crumb ("Crumb") and a charitable organization known as 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") raised at least \$145,132.08, purportedly to rescue horses from slaughter between September 2009 and September 2010.

2. In contradiction to NJ Horse Angels' mission, some of the charitable contributions paid for Crumb's gambling, jewelry for Crumb's unemployed live-in boyfriend Frank Wikoff ("Wikoff"), a trustee of NJ Horse Angels and a convicted felon;

and for Crumb's own personal horse. Crumb withdrew \$16,490.45 of the charitable contributions in cash. The charitable contributions also paid for entertainment and phone bills, and cash for Crumb's son, currently serving a life sentence at Trenton State Prison, and cash for Crumb's son's childhood friend, Baron Roesler ("Roesler"), a parolee.

JURISDICTION AND VENUE

3. As set forth more fully below, Plaintiffs bring this civil action against Crumb, Wikoff, and NJ Horse Angels pursuant to the New Jersey Charitable Registration and Investigation Act ("Charities Act") N.J.S.A. 45:17A-18 et seq. and all regulations promulgated thereunder, N.J.A.C. 13:48-1 et seq. ("Charities Regulations"), for violations of: (1) N.J.S.A. 45:17A-23(a); (2) N.J.S.A. 45:17A-23(b); (3) N.J.S.A. 45:17A-24(a); (4) N.J.S.A. 45:17A-31; (5) N.J.S.A. 45:17A-32(a), (c)(1); (6) N.J.S.A. 45:17A-32(c)(1); and (5) N.J.S.A. 45:17A-32(b).

4. Jurisdiction is proper over Crumb, Wikoff, and NJ Horse Angels pursuant to N.J.S.A. 45:17A-39, because they engaged in activities regulated by the Charities Act in and from New Jersey.

5. Venue is proper pursuant to R. 4:3-2 because the Acting Director's principal place of business is in Essex County.

PARTIES

6. The Attorney General is charged with the responsibility of enforcing the Charities Act.
7. The Acting Director is the principal executive of the New Jersey Division of Consumer Affairs.
8. The Acting Director is charged with the administration and enforcement of the Charities Act. Such administration includes the registration and regulation of charitable organizations, independent paid fund raisers, and solicitors.
9. At all relevant times, Crumb resided in Phillipsburg, New Jersey.
10. At all relevant times, Wikoff was Crumb's live-in boyfriend.
11. Wikoff is a convicted felon.
12. At all relevant times, Wikoff resided with Crumb in Phillipsburg, New Jersey.
13. NJ Horse Angels is a New Jersey non-profit corporation.
14. NJ Horse Angels was incorporated on February 22, 2010.
15. NJ Horse Angels has a principal place of business at 185 Washington Street, Phillipsburg, New Jersey.
16. Crumb is a trustee of NJ Horse Angels.
17. Wikoff is a trustee of NJ Horse Angels.
18. NJ Horse Angels is not registered as a charitable organization with the Attorney General.
19. NJ Horse Angels is not exempt from registration.

20. At all relevant times, NJ Horse Angels' principal place of business was located at Crumb's residence.

FACTUAL BACKGROUND

21. 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."

22. 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.

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

24. Crumb and NJ Horse Angels primarily bailed horses from Camelot Auction Company ("Camelot"), located in Cranbury, New Jersey.

25. 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.

26. However, there were occasions when horses were purchased on behalf of NJ Horse Angels during Camelot's weekly auction.

27. Crumb and NJ Horse Angels solicited charitable contributions through the website, www.facebook.com ("Facebook").

28. Crumb and NJ Horse Angels solicited charitable contributions on Facebook through at least three group pages.

29. Crumb and NJ Horse Angels solicited charitable contributions through the Facebook group page, "NJ Killpen Horses . . . Horse Angels of Facebook."

30. Crumb and NJ Horse Angels solicited charitable contributions through the Facebook group page, "Camelot Auction Horse Angels."

31. Crumb and NJ Horse Angels solicited charitable contributions through the Facebook group page, "The Forgotten Angels."

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

33. Crumb and NJ Horse Angels solicited charitable contributions through a blog, www.njhorseangels.blogspot ("NJ Horse Angels blog").

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

35. 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.

36. Crumb and NJ Horse Angels requested that its members solicit charitable contributions through members' own pages or other Facebook groups (known as "cross-posting").

37. Other individuals could also access NJ Horse Angels Facebook group pages via group members' access to the NJ Horse Angels Facebook groups.

38. 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.

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

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

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

42. On October 25, 2007, Crumb opened a PayPal account associated with the e-mail address: working4them@gmail.com ("Working4them@gmail.com PayPal Account").

43. 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.

44. On March 7, 2010, Crumb opened a separate PayPal account associated with sharonsfun21@yahoo.com ("Sharonsfun21@yahoo.com PayPal Account").

45. On or about August 1, 2010, Crumb used sharonsfun21@gmail.com as an alternate e-mail address on the Sharonsfun21@yahoo.com PayPal Account.

46. On February 28, 2008, Crumb and Wikoff opened a combined personal checking and savings account at IROC Community FCU Account ("Personal Account").

47. Wikoff was removed as a signatory from the Personal Account on October 23, 2008.

48. On March 2, 2010, Crumb established an IROC Community Credit business checking and savings account in the names of NJ Horse Angels and Crumb ("Business Account").

49. Crumb was the sole signatory on the Business Account.

50. Crumb signed as President of NJ Horse Angels on the Business Account.

51. On August 10, 2009, Crumb linked the Personal Account to the Working4them@gmail.com PayPal Account.

52. On March 2, 2010, Crumb upgraded the Working4them@gmail.com PayPal Account to a Business PayPal Account as a nonprofit charity.

53. On March 2, 2010, Crumb linked the Business Account to the Working4them@gmail.com PayPal Account.

54. On March 7, 2010, Crumb linked the Personal Account to the Sharonsfun21@yahoo.com PayPal Account.

55. On May 20, 2010, "Christopher Crumb NJ State Prison" was added as a "web gift address" to the Sharonsfun21@yahoo.com PayPal Account.

56. Christopher Crumb is Crumb's son, who is serving a life sentence at Trenton State prison.

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

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

59. 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.

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

61. Crumb also commingled charitable contributions in her Personal Account.

62. Crumb expended charitable contributions in a manner inconsistent with the stated charitable purpose of NJ Horse Angels by misappropriating at least \$61,422.51 of the charitable contributions.

63. Upon information and belief, 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.

64. Upon information and belief, 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.

65. Upon information and belief, Crumb spent charitable contributions on Atlantic City casinos, prepaid phone cards for Christopher Crumb, shopping, phone bills, dining out, and cash withdrawals.

66. Upon information and belief, 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.

67. Upon information and belief, Crumb spent charitable contributions on her own personal horse.

68. Upon information and belief, Crumb transferred charitable contributions to Christopher Crumb.

69. Upon information and belief, Crumb transferred charitable contributions to Roesler.

70. Upon information and belief, Crumb bought jewelry with the proceeds of charitable contributions for Wikoff.

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

72. 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.

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

74. 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.

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

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

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

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

79. 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.

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

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

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

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

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

85. 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.

86. 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.

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

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

COUNT I

FAILING TO REGISTER AS A CHARITABLE ORGANIZATION IN VIOLATION OF
N.J.S.A. 45:17A-23(a), 45:17A-24(a), and 45:17A-26
(As to NJ Horse Angels and trustees Crumb and Wikoff)

89. Plaintiffs repeat the allegations in the preceding paragraphs as if fully set forth herein.

90. 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.

91. 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.

92. 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.

93. NJ Horse Angels was not exempt from registration.

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

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

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

97. NJ Horse Angels' failure to register and the trustees' failure to ensure that NJ Horse Angels registered with the

Attorney General is a violation of N.J.S.A. 45:17A-23(a) and is cause for the imposition of a civil monetary penalty pursuant to N.J.S.A. 45:17A-33(d).

98. NJ Horse Angels' failure to file a long form registration statement and the trustees' 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) and is cause for the imposition of civil penalties pursuant to N.J.S.A. 45:17A-33(d).

COUNT II

SOLICITING DONATIONS WITHOUT REGISTERING AS A CHARITABLE ORGANIZATION IN VIOLATION OF N.J.S.A. 45:17A-23(b)

(As to NJ Horse Angels and Crumb and trustees Crumb and Wikoff)

99. Plaintiffs repeat the allegations in the preceding paragraphs as if fully set forth herein.

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

101. NJ Horse Angels and Crumb solicited, or permitted solicitations on NJ Horse Angels' behalf, without NJ Horse Angels being a registered charitable organization.

102. Each solicitation while unregistered is a violation of N.J.S.A. 45:17A-23(b) and is cause for the imposition of a civil monetary penalty for each separate violation pursuant to N.J.S.A. 45:17A-33(d).

COUNT III

FAILING TO MAINTAIN COMPLETE AND ACCURATE RECORDS OF FUNDRAISING
ACTIVITIES IN VIOLATION OF N.J.S.A. 45:17A-31

(As to NJ Horse Angels and trustees Crumb and Wikoff)

103. Plaintiffs repeat the allegations in the preceding paragraphs as if fully set forth herein.

104. 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.

105. NJ Horse Angels failed to maintain complete and accurate records of its fundraising activities in New Jersey.

106. The failure by NJ Horse Angels to maintain complete and accurate records of NJ Horse Angels' fundraising activities in New Jersey and the trustees' failure to ensure NJ Horse Angels' compliance constitutes a violation of N.J.S.A. 45:17A-31, and is cause for the imposition of a civil monetary penalty pursuant to N.J.S.A. 45:17A-33(d).

COUNT IV

MAKING FALSE AND MISLEADING STATEMENTS AND OMITTING MATERIAL
FACTS IN VIOLATION OF N.J.S.A. 45:17A-32(a), (c) (1)

(As to NJ Horse Angels and Crumb and trustees Crumb and Wikoff)

107. Plaintiffs repeat the allegations in the preceding paragraphs as if fully set forth herein.

108. 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.

109. 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.

110. Crumb and NJ Horse Angels' false and misleading written and/or oral statements including, but 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.

111. 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.

112. Each violation of N.J.S.A. 45:17A-32(a), (c) (1) is a separate violation and is cause for the imposition of a civil monetary penalty for each separate violation pursuant to N.J.S.A. 45:17A-33(d).

COUNT V

EXPENDING CHARITABLE CONTRIBUTIONS IN A MANNER INCONSISTENT WITH THE STATED CHARITABLE PURPOSE OF THE CHARITABLE ORGANIZATION IN VIOLATION OF N.J.S.A. 45:17A-32(c) (1)

(As to NJ Horse Angels and Crumb and trustees Crumb and Wikoff)

113. Plaintiffs repeat the allegations in the preceding paragraphs as if fully set forth herein.

114. 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.

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

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

117. Crumb, through NJ Horse Angels, used at least \$61,422.51 of charitable contributions for personal expenses rather than on NJ Horse Angels' stated charitable purpose.

118. Each expenditure of charitable contributions in a manner inconsistent with NJ Horse Angels' stated charitable purpose constitutes a separate violation of N.J.S.A. 45:17A-32(c)(1), and is cause for the imposition of civil monetary penalties pursuant to N.J.S.A. 45:17A-33(d).

COUNT VI

**FAILING TO ESTABLISH AND EXERCISE CONTROL OVER FUNDRAISING
ACTIVITIES IN VIOLATION OF N.J.S.A. 45:17A-32(b)**
(As to NJ Horse Angels and Crumb and trustees Crumb and Wikoff)

119. Plaintiffs repeat the allegations in the preceding paragraphs as if fully set forth herein.

120. 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.

121. NJ Horse Angels and Crumb and its trustees Crumb and Wikoff failed to establish and exercise control over NJ Horse Angels' fundraising activities.

122. NJ Horse Angels and Crumb and its trustees Crumb and Wikoff failed to ensure that all the charitable contributions solicited and collected on behalf of NJ Horse Angels were used for NJ Horse Angels.

123. Each 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), and is cause for the

imposition of civil monetary penalties pursuant to N.J.S.A.
45:17A-33(d).

COUNT VII

UNJUST ENRICHMENT
(As to Wikoff)

124. Plaintiffs repeat the allegations in the preceding paragraphs as if fully set forth herein.

125. Wikoff received items of value which can be traced to the use of the proceeds of charitable contributions.

126. Wikoff had no legal right to benefit from the use of the proceeds of charitable contributions.

127. The proceeds of charitable contributions belonged to the donors to be used for NJ Horse Angels and/or returned to them.

128. Wikoff has been unjustly enriched.

129. Each unauthorized receipt of an item of value by Wikoff as a result of use of the proceeds of charitable contributions is cause for the disgorgement of the items.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff petitions this Court for an order and judgment:

a. Finding that defendants NJ Horse Angels and Crumb and Wikoff, individually and as trustees of NJ Horse Angels, engaged in the acts and practices alleged above;

b. Finding that such acts and practices constituted violations of the Charities Act;

c. Permanently enjoining defendants Crumb, Wikoff, and NJ Horse Angels, individually and by or through any corporation, business entity, stockholder, employee, officer, director, principal, trustee, and/or any other person who is directly or indirectly under their control or direction, from violating the Charities Act and Charities Regulations;

d. Permanently enjoining defendant NJ Horse Angels individually, and by or through any other corporation, business entity, stockholder, employee, officer, director, principal, trustee, and/or any other person, who is directly or indirectly under defendant NJ Horse Angels' control or direction, from directly or indirectly acting as a charitable organization, or holding itself out as a charitable organization, independent paid fund raiser, or solicitor, or holding itself out as having a charitable purpose, from or within the State of New Jersey;

e. Permanently enjoining defendants Crumb and Wikoff individually and by or through any other corporation, business entity, stockholder, employee, officer, director, principal, trustee, and/or any other person, who is directly or indirectly under defendant Crumb or Wikoff's control or direction, from directly or indirectly acting on behalf of a charitable organization, or holding themselves out as acting on behalf of a charitable organization, independent paid fund raiser, or solicitor, for a charitable purpose, and from acting as

employees, officers, directors, principals, trustees, owners, shareholders, founders, managers, agents, servants, volunteers, representatives, independent contractors, independent paid fund raisers, or solicitors of any fund raising organization which solicits charitable contributions from or within the State of New Jersey;

f. Permanently enjoining defendant NJ Horse Angels, individually and by or through any corporation, business entity, stockholder, employee, officer, director, principal, trustee, and/or any other person who is directly or indirectly under its control or direction, from directly or indirectly, publicly or privately soliciting charitable contributions, on behalf of defendant NJ Horse Angels, any other horse rescue organization, and any other organization that is acting as, or holding itself out as, a charitable organization or having a charitable purpose, from or within the State of New Jersey;

g. Permanently enjoining defendants Crumb and Wikoff, individually and by or through any corporation, business entity, stockholder, employee, officer, director, principal, trustee, and/or any other person who is directly or indirectly under defendants Crumb and Wikoff's control or direction, from directly or indirectly, publicly or privately soliciting charitable contributions, on behalf of defendants Crumb, Wikoff, NJ Horse Angels, any other horse rescue organization, and any other organization that is acting as, or holding itself out as,

a charitable organization or having a charitable purpose from or within the State of New Jersey;

h. Permanently enjoining defendants Crumb, Wikoff, and NJ Horse Angels, individually, and by or through any corporation, business entity, stockholder, employee, officer, director, principal, trustee, and/or any other person who is directly or indirectly under their control or direction, from directly or indirectly destroying, altering, concealing, transferring, disposing or removing in any manner, directly or indirectly, any books, records, documents, information stored in electronic format, including on computers or electronic devices, maintained in any form, within their knowledge, possession, direction, or control, relating in any way to the business affairs of defendant NJ Horse Angels;

i. Permanently enjoining defendants Crumb, Wikoff, and NJ Horse Angels from posting on the Internet and on any and all websites, blogs, Facebook groups, and any other electronic forms of advertisement and/or solicitation referring and/or relating to NJ Horse Angels, including, but not limited to, on Facebook groups NJ Killpen Horses . . . Horse Angels of Facebook, Camelot Auction Horse Angels, and The Forgotten Angels, www.njhorseangelsrescue.org, and www.njhorseangels.blogspot;

j. Directing defendants Crumb, Wikoff, and NJ Horse Angels to remove and/or cause to be removed from the Internet any and all websites, blogs, Facebook groups, and any other electronic form of advertisement and/or solicitation referring and/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;

k. Directing Crumb, Wikoff, and NJ Horse Angels to restore to any affected person 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, boarding, food, and veterinary care, and that were not apportioned to such express purpose, or other charitable contributions that were not so used;

l. Providing that 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;

m. Assessing joint and several civil monetary penalties against Crumb, Wikoff, and NJ Horse Angels for each separate act of violating the Charities Act in accordance with N.J.S.A. 45:17A-33(d);

n. Directing defendants Crumb, Wikoff, and NJ Horse Angels to disgorge all profits and/or charitable contributions gained through violations of the Charities Act;

o. Impounding, from NJ Horse Angels' business premises located at 185 Washington Street, Phillipsburg, New Jersey, all documents, files, records, computers, keyboard, monitors, printers, and any other tangible item relating to the business affairs of defendant NJ Horse Angels and permitting Plaintiffs to retain such documents, files, records, computers, keyboard, monitors, printers, and any other tangible item;

p. Freezing the assets of defendants Crumb and NJ Horse Angels, in which either or both of them hold a legal or equitable interest, including all real and personal property, in that such assets should not be disposed of, transferred, dissipated, encumbered, or withdrawn, removed, or sold, with the exception of a reasonable living expense allowance as determined by the Court. Assets include, but are not limited to, accounts in any and all financial institutions, brokerage, trading, and retirement accounts, real property, and personal property; and

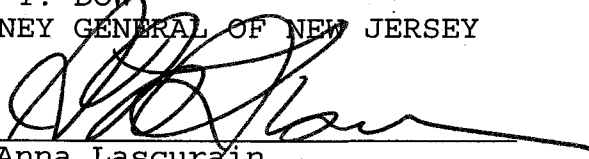
q. Granting such other relief as the interests of justice

[THIS SECTION INTENTIONALLY LEFT BLANK.]

may require.

PAULA T. DOW
ATTORNEY GENERAL OF NEW JERSEY

By:




Anna Lascurain
Deputy Attorney General

Dated:

12/2/2010

PAULA T. DOW
ATTORNEY GENERAL OF NEW JERSEY

By:



Elizabeth R. Lash
Deputy Attorney General

Dated:

12/2/2010

RULE 4:5-1 CERTIFICATION

Pursuant to Rule 4:5-1, the undersigned certifies that the matter in controversy is not the subject of any pending or contemplated actions.

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).

I certify that the foregoing statements made by me are true. I am aware that if any of those statements are willfully false, I am subject to punishment.

PAULA T. DOW
ATTORNEY GENERAL OF NEW JERSEY

By: 

Anna Lascurain
Deputy Attorney General

Dated: 12/2/2010

PAULA T. DOW
ATTORNEY GENERAL OF NEW JERSEY


By: 

Elizabeth R. Lash
Deputy Attorney General

Dated: 12/2/2010

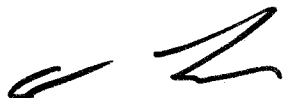
DESIGNATION OF TRIAL COUNSEL

Pursuant to Rule 4:25-2, Deputy Attorneys General Anna Lascurain and Elizabeth Lash are hereby designated as trial counsel for this matter.

By: 

Anna Lascurain
Deputy Attorney General

Dated: 11/2/2010

By: 

Elizabeth R. Lash
Deputy Attorney General

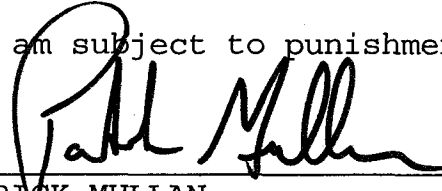
Dated: 12/2/2010

VERIFICATION

PATRICK MULLAN, of full age, certifies as follows:

1. I am an Investigator with the New Jersey Division of Consumer Affairs ("Division"), Office of Consumer Protection.
2. I have read the foregoing Verified Complaint and on my own personal knowledge and review of documents in possession of the Division, I know that the facts set forth herein are true and they are incorporated in this certification by reference, except for those alleged upon information and belief.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.



PATRICK MULLAN
INVESTIGATOR
NJ DIVISION OF CONSUMER AFFAIRS

Dated: 12/2/10