1	XAVIER BECERRA Attorney General of California
2	ALICIA BERRY Deputy Attorney General
3	State Bar No. 228367 300 South Spring Street, Suite 1702
4	Los Angeles, CA 90013 Telephone: (213) 269-6550
5	Fax: (213) 897-7605
6	E-mail: Alicia.Berry@doj.ca.gov Attorneys for Attorney General, State of California
7	
8	BEFORE THE ATTORNEY GENERAL
9	
10	STATE OF CALIFORNIA
11	
12	
13	In the matter of the Order to Cease and Desist
14	and Notice of Intent to Revoke Registration, REGISTRATION AND IMPOSITION OF
15	JONATHAN COSSU (AKA JONNY PRESTON), INDIVIDUALLY, AND ON BEHALF OF URGENT INDIVIDUALLY, AND ON BEHALF OF URGENT
16	Dogs of LA, DOGS OF LA, PENALTIES DIRECTED TO URGENT DOGS OF LA AND ITS BOARD OF
17	RESPONDENT. DIRECTORS
18	
19	
20	
21	URGENT DOGS OF LA is ordered to immediately CEASE AND DESIST from all
22	California operations, including all solicitations for charitable purposes by any means, pursuant to
23	Government Code section 12591.1, subdivision (b). This order applies to URGENT DOGS OF
24	LA, its officers, directors, employees, and all persons or entities acting on its behalf.
25	Based on the violations set forth below, the registration of URGENT DOGS OF LA
26	(UDLA) will be revoked and penalties will be imposed unless the enclosed written appeal is
27	received within 30 calendar days of the date of this notice. If a written appeal is not received,
28	
	1

1	registration for UDLA will be revoked, the penalties will become final, and UDLA will not be
2	permitted to conduct business in the State of California.
3	Government Code section 12598, subdivision (e)(1), provides that the Attorney General
4	may revoke or suspend the registration of a charitable corporation for violations of the
5	Supervision of Trustees and Fundraisers for Charitable Purposes Act ("the Supervision Act")
6	(Government Code section 12580 et. seq.).
7	Government Code section 12591.1, subdivision (c), provides that the Attorney General may
8	impose a penalty not to exceed \$1,000 for each act or omission that constitutes a violation of the
9	Supervision Act.
10	FACTS AND VIOLATIONS IN SUPPORT OF REGISTRATION REVOCATION
11	AND CEASE AND DESIST ORDER
12	The revocation of UDLA's registration and imposition of penalties are based on the
13	following facts and violations:
14	1. UDLA is a California Nonprofit Public Benefit Corporation that holds all of its assets
15	subject to a charitable trust. Jonathan Cossu (aka Jonny Preston, hereinafter "COSSU") founded
16	UDLA, is a director and officer of UDLA, and posted solicitations on behalf of UDLA on social
17	media, including Facebook and Instagram. COSSU's status as a director, as well as his
18	solicitation activities, created a fiduciary relationship between himself and UDLA. (Bus. & Prof.
19	Code, § 17510.3) All donations received through COSSU on behalf of UDLA are held pursuant
20	to a charitable trust and a duty to use such contributions for the declared charitable purposes for
21	which they were sought. (Bus. & Prof. Code, § 17510.8.)
22	2. UDLA was required to register with the Attorney General's Registry of Charitable
23	Trusts (hereafter "Registry") within 30 days after initially receiving property as mandated under
24	Government Code sections 12585 and 12599.6, subdivision (f)(1). UDLA, through COSSU,
25	began operating, soliciting and collecting property for charitable purposes in or around June 2016,
26	but failed to register with the Registry until April 2018. The Registry issued a cease and desist
27	order to UDLA on March 26, 2018 for failing to register in violation of Government Code section
28	12585. UDLA subsequently registered on April 3, 2018 and was issued registration number

1 CT0256770 by the Registry. Subsequent investigation has revealed additional violations, 2 including that UDLA's initial registration filings contain materially false statements, as further 3 described below.

4

5

6

7

3. According to its bylaws, UDLA's stated purpose is to rescue, and provide medical assistance, to abandoned and sheltered dogs. UDLA's articles of incorporation, state that "[t]his corporation is organized and operated exclusively for the purposes set forth in Article 4 hereof (rescue animals) within the meaning of Internal Revenue Code section 501(c)(3)." When a 8 corporation is organized solely for charitable purposes, its assets are deemed to be impressed with 9 a charitable trust. (Pacific Home v. Los Angeles (1953) 41 Cal.2d 844, 852.)

10 4. UDLA has applied for, but does not have, 501(c)(3) tax-exempt status through the 11 Internal Revenue Service or the Franchise Tax Board. UDLA applied for tax-exempt status in 12 January 2018. Business and Professions Code sections 17501.3 and 17510.4 require that 13 solicitations on behalf of non-tax-exempt organizations disclose that contributions are not tax 14 deductible." However, COSSU on behalf of UDLA has continuously claimed to have tax-exempt 15 status, when UDLA does not. COSSU signed UDLA's Initial Registration (Form CT-1), under 16 penalty of perjury, claiming that UDLA received tax-exemption in December 2017, when UDLA 17 did not even request tax-exempt status until January 2018. One of COSSU's Instagram videos 18 takes place in front of the Wilshire Grand hotel, in which he claims "I'm going to walk up every 19 single flight of stairs here for shelter dogs. We're going to raise money, we're going to create 20 awareness and this is a beautiful thing. All of your donations are tax-deductible while we're in 21 the process of approval for our 501(c) and every single dollar you give goes to those shelter 22 dogs." In at least three additional social media posts, COSSU claims that UDLA has tax-exempt 23 status. These practices created a likelihood of confusion or misunderstanding in violation of 24 Government Code section 12599.6, subdivision (f)(2), and further violate Business and Professions Code sections 17501.3 and 17501.4 by indicating that UDLA has tax-exempt status, 25 26 when it did not.

27 5. UDLA failed to file a completed and signed IRS Form 990 within the time required 28 by law for the fiscal years ending in 2016 through 2017 in violation of Government Code sections

1 12586, subdivision (a), 12591.1, subdivision (b)(3), and California Code of Regulations, title 11, 2 sections 301 through 306 and 311.

3 The Government Code prohibits using any unfair or deceptive acts or practices or 6. 4 engaging in any fraudulent conduct that creates a likelihood of confusion or misunderstanding. 5 (Gov. Code, §§ 12599.6, subd. (f)(2).) Charitable organizations are further prohibited from misleading anyone to believe that any other person sponsors or approves a charitable solicitation 6 7 when that person has not given written consent, and using the fact of registration with the 8 Registry to lead any person to believe that the registration in any manner constitutes an 9 endorsement or approval by the Attorney General. (Gov. Code § 12599.6, subd. (f)(5) and (7).) 10 A review of UDLA's Instagram page includes a video of COSSU in front of the Attorney 11 General's Office in Sacramento. In the video, COSSU appears to be holding UDLA's 12 registration forms, and states: "Not only are we now fully trusted as a charitable trust by the 13 Attorney General here in Sacramento. So now you know all your donations are approved by the 14 Attorney General. And, I showed them all of our bank statements so you guys can know that 15 every dollar that you give us here at Urgent Dogs of LA is trusted by the Attorney General. He 16 saw it for himself." In another Instagram post, UDLA announces their website will be coming 17 soon and includes "donations trusted by" along with the logo for the California Office of the 18 Attorney General. A third post announces a 255 mile walk to San Jose to benefit UDLA, and 19 again includes the logo of the California Office of the Attorney General. In yet another post 20 related to the 255 mile walk, COSSU includes the logo of the Attorney General and claims that 21 UDLA is a "certified charitable org." These statements are not only misleading, unfair, and 22 deceptive, they are tantamount to a personal endorsement from the California Attorney General, and are strictly prohibited. (Gov. Code § 12599.6, subd. (f)(2), (5), (7).) 23

24

7. Government Code section 12599.6 (f)(3) prohibits using any name suggesting or 25 implying that the contribution is to benefit a particular charitable organization when that is not the 26 fact. It is also unlawful to represent that any part of a contribution will be given or donated to any 27 other charitable organization unless that organization has consented in writing to the use of its 28 name prior to the solicitation. (Gov. Code 12599.6, subd. (f)(11).) UDLA made at least three

1 fundraising pleas for specific dogs that are not and were never in the custody or care of UDLA, 2 but rather were in the care of other charitable organizations, including SPCA Los Angeles and 3 Camp Cocker Rescue. COSSU did not have written permission to conduct said fundraising, and did not transfer any funds to either SPCA LA or Camp Cocker Rescue. These fundraising 4 5 appeals are misleading and are prohibited. (Gov. Code § 12599.6, subd. (f)(3) and (11).)

UDLA failed to file a completed and signed Form RRF-1 within the time required by 6 8. 7 law for the fiscal years ending in 2016 and 2017 in violation of Government Code sections 12586, subdivision (a), 12591.1, subdivision (b)(3), and California Code of Regulations, title 11, sections 8 9 301 through 306 and 311.

10 9. UDLA made material false statements in an application statement or report required 11 to be filed for the reasons stated in paragraph 4, in violation of Government Code section 12599.6, subdivision (g), and California Code of Regulations, title 11, section 999.9, subdivision 12 13 (c).

14 10. COSSU, as a director of UDLA, failed to comply with the Standards of Conduct for 15 nonprofit corporations in violation of California Code of Regulation, title 11, section 999.9. 16 subdivision (d), by allowing the conduct stated in paragraphs 1 through 9, and failed to comply 17 with Corporations Code section 5231, subdivision (a), in that he failed to perform the duties of a director in good faith, in a manner that the director believed to be in the best interests of the 18 19 corporation and with such care, including reasonable inquiry, as an ordinarily prudent person in a 20 like position would use under similar circumstances.

21 11. UDLA operated in violation of the requirements of the Supervision Act and related 22 regulations, for the reasons stated in paragraphs 1 through 8, in violation of Government Code 23 section 12599.6, subdivision (f)(1).

- 24
- 25

ORDER OF REVOCATION

A. Registration number CT0256770 issued to UDLA is revoked. Β. UDLA may not distribute or expend any charitable asset without the written approval 26 27 of the Attorney General. Members of the board of directors, and any person directly involved in a 28 violation of this provision may be held personally liable for any charitable asset distributed or

1 expended in violation of this order. 2 C. Within 30 days, UDLA shall provide a list of all assets within its possession, custody 3 or control. 4 D. Within 30 days, UDLA shall provide an accounting of all assets received, held, 5 disbursed or that belong to the organization from June 1, 2016 through the date of the response. 6 The accounting shall include the following information: 7 i. Accountings for fiscal year 2016 through the date of this order; ii. 8 Statements from all financial accounts (including checking, savings, 9 investment, credit card, PayPal, and BluePay) from June 1, 2016, through the date of 10 the response. 11 iii. All minutes of any proceeding of the board of directors, members or 12 committees; 13 iv. A schedule of all payments made to any officers, directors or employees of 14 UDLA and anyone related to any officer, director or employee. This schedule shall include the check number, date, amount and a complete description of the purpose of 15 16 the disbursement, along with all supporting documentation. 17 A schedule of all payments made to any business or other entity in which the v. 18 officers, directors or employees of UDLA and anyone related to any officer, director 19 or employee of UDLA, has or had a financial interest. This schedule is to include the 20 check number, date, amount and a complete description of the purpose of the 21 disbursement, along with all supporting documentation. 22 vi. All correspondence, contracts, agreements, leases, and loan documents between 23 UDLA and its officers or directors. This includes any business in which an officer or 24 director and anyone related to the officer or director has or had a financial interest. 25 vii. A copy of the general ledger or check register. If the ledger is maintained 26 electronically, a copy shall be produced in .xls or an equivalent format. 27 viii. Current contact information, including the last known address, phone number 28 and email address for all of UDLA's board members from 2016 to present.

1		ix. The Attorney General shall retain jurisdiction over Urgent Dog	s of LA
2		(UDLA), its officers, directors and key employees to ensure complian	ice with this
3		order and the provisions of the Supervision of Trustees and Fundraise	rs for Charitable
4		Purposes Act.	
5		x. Failure to comply with the terms of this order constitutes disob	edience or
6		resistance to a lawful order pursuant to Government Code section 114	55.10. The
7		Attorney General may pursue a contempt sanction for violations purs	
8		Government Code section 11455.20, in addition to any other remedie	
9		Attorney General.	
10		ASSESSMENT OF PENALTIES	
11	2	12. The Attorney General may assess a penalty up to \$1,000 for each act	or omission that
12	cons	titutes a violation pursuant to Government Code section 12591.1, subdivisio	
13	California Code of Regulations, title 11, sections 315 and 999.6, subdivision (a)(3). The		
14			
15	assessment of penalties is in addition to all other remedies available to the Attorney General and		
	the Attorney General reserves the right to assert all other remedies. The Attorney General		
16	asses	ses the following penalties:	
17			
18		VIOLATION	AMOUNT
19	a.	Failing to register as a charitable organization within 30 days of the initial receipt of property, in violation of Government Code sections 12585(a) and 12591.1(b)(3); and California Code of Regulations, title	\$1,000.00
20		11, sections 301 through 306 and 311. Making a material false statement in Form CT-1 (Initial Registration), by	\$1,000.00
21 22	b.	answering "Yes" to the question: "If known, are contributions to the organization tax-deductible?" and answering 12/29/2017 as the date of	\$1,000.00
23		exemption letter, when in fact, UDLA does not have tax-exempt status, in violation of Government Code sections 12591.1 (b)(2) and 12599.6(g); and California Code of Regulations section 999.9(c).	
1000 00		Misrepresenting in numerous charitable solicitations that UDLA has tax-	\$4,000.00
24 25	с.	exemption, when it does not, in violation of Government Code section 12599.6 (f)(2), and Business and Professions Code sections 17510.3 and 17510.4 . Each misrepresentation constitutes a separate violation.	
26 27	d.	Failing to file a completed and signed Form RRF-1 within the time required by law for fiscal years ending in 12/31/2016, in violation of Government Code sections 12586(a) and 12591.1(b)(3); and California Code of Regulations, title 11, sections 301 through 306 and 311.	\$1,000.00
28			
	,	7	

Notice of Intent to Revoke Registration; Order to Cease and Desist (Case 2018-CT0256770)

1 2	e	Failing to file a completed and signed Form RRF-1 within the time required by law for fiscal years ending in 12/31/2017, in violation of Government Code sections 12586(a) and 12591.1(b)(3); and California Code of Regulations, title 11, sections 301 through 306 and 311.	\$1,000.00
3 4	f.	Failing to file a completed and signed IRS Form 990 within the time required by law for the fiscal years ending 12/31/2016, in violation of Government Code sections 12586(a) and 12591.1(b)(3); and California Code of Regulations, title 11, sections 301 through 306 and 311.	\$1,000.00
5 6	g.	Failing to file a completed and signed IRS Form 990 within the time required by law for the fiscal years ending 12/31/2017, in violation of Government Code sections 12586(a) and 12591.1(b)(3); and California Code of Regulations, title 11, sections 301 through 306 and 311.	\$1,000.00
7 8 9	h.	Using the fact of registration with the Registry to lead any person to believe that the registration constitutes an endorsement or approval by the Attorney General, in violation of Government Code section $12599.6(f)(5)$ and (7). Each misrepresentation constitutes a separate violation.	\$4,000.00
10	i.	Using any name suggesting or implying that the contribution is for the benefit of a particular charitable organization when that is not the fact, in violation of Government Code section 12599.6 (f)(3).	\$3,000.00
11 12	j.	Representing that any part of a contribution will be given or donated to any other charitable organization unless that organization has consented in writing to the use of its name prior to the solicitation, in violation of Government Code section $12599.6(f)(11)$. Each misrepresentation	\$3,000.00
13		constitutes a separate violation.	14
14		TOTAL PENALTY:	\$20,000.00
1 -			
15 16 17		ASE AND DESIST ORDER AGAINST URGENT DOGS OF LA AND ND FORMER BOARD MEMBER JONATHAN COSSU (AKA JONN	
16		ND FORMER BOARD MEMBER JONATHAN COSSU (AKA JONN	Y PRESTON)
16 17	<u>A</u>]	i i	Y PRESTON) 1 California,
16 17 18	<u>Al</u> inclu	ND FORMER BOARD MEMBER JONATHAN COSSU (AKA JONN 1. UDLA shall immediately CEASE AND DESIST from all operations in	Y PRESTON) a California, ies to UDLA, its
16 17 18 19	<u>A</u> inclue	ND FORMER BOARD MEMBER JONATHAN COSSU (AKA JONN 1. UDLA shall immediately CEASE AND DESIST from all operations in ding all solicitations for charitable purposes by any means. This order appl ers, directors, employees and all persons or entities acting on its behalf, incl	Y PRESTON) a California, ies to UDLA, its
16 17 18 19 20	<u>A</u> inclue	ND FORMER BOARD MEMBER JONATHAN COSSU (AKA JONN 1. UDLA shall immediately CEASE AND DESIST from all operations in ding all solicitations for charitable purposes by any means. This order appl	<u>Y PRESTON)</u> a California, ies to UDLA, its uding
16 17 18 19 20 21	<u>A</u> inclue	ND FORMER BOARD MEMBER JONATHAN COSSU (AKA JONN 1. UDLA shall immediately CEASE AND DESIST from all operations in ding all solicitations for charitable purposes by any means. This order appl ers, directors, employees and all persons or entities acting on its behalf, incl nercial fundraisers for charitable purposes soliciting on its behalf.	<u>Y PRESTON)</u> a California, ies to UDLA, its uding
16 17 18 19 20 21 22	<u>A</u> inclue	 ND FORMER BOARD MEMBER JONATHAN COSSU (AKA JONN 1. UDLA shall immediately CEASE AND DESIST from all operations in ding all solicitations for charitable purposes by any means. This order appl ers, directors, employees and all persons or entities acting on its behalf, incl nercial fundraisers for charitable purposes soliciting on its behalf. Within 10 days from the date of this order, UDLA will provide a copy 	Y PRESTON) California, ies to UDLA, its uding of this order to:
 16 17 18 19 20 21 22 23 	<u>A</u> inclue	 ND FORMER BOARD MEMBER JONATHAN COSSU (AKA JONN 1. UDLA shall immediately CEASE AND DESIST from all operations in ding all solicitations for charitable purposes by any means. This order appl ers, directors, employees and all persons or entities acting on its behalf, incl nercial fundraisers for charitable purposes soliciting on its behalf. Within 10 days from the date of this order, UDLA will provide a copy a. Every officer, director and employee of UDLA; 	Y PRESTON) California, ies to UDLA, its uding of this order to:
 16 17 18 19 20 21 22 22 23 24 	<u>A</u> inclue	 ND FORMER BOARD MEMBER JONATHAN COSSU (AKA JONN 1. UDLA shall immediately CEASE AND DESIST from all operations in ding all solicitations for charitable purposes by any means. This order appl ers, directors, employees and all persons or entities acting on its behalf, incl nercial fundraisers for charitable purposes soliciting on its behalf. Within 10 days from the date of this order, UDLA will provide a copy a. Every officer, director and employee of UDLA; b. Every governmental entity with which UDLA is required to register 	Y PRESTON) California, ies to UDLA, its uding of this order to:
 16 17 18 19 20 21 22 23 24 25 	<u>A</u> inclue	 ND FORMER BOARD MEMBER JONATHAN COSSU (AKA JONN) 1. UDLA shall immediately CEASE AND DESIST from all operations in ding all solicitations for charitable purposes by any means. This order applers, directors, employees and all persons or entities acting on its behalf, inclunercial fundraisers for charitable purposes soliciting on its behalf. 2. Within 10 days from the date of this order, UDLA will provide a copy a. Every officer, director and employee of UDLA; b. Every governmental entity with which UDLA is required to register conduct charitable solicitations; 	Y PRESTON) California, ies to UDLA, its uding of this order to:
 16 17 18 19 20 21 22 23 24 25 26 	Al inclue office comm	 ND FORMER BOARD MEMBER JONATHAN COSSU (AKA JONN) 1. UDLA shall immediately CEASE AND DESIST from all operations in ding all solicitations for charitable purposes by any means. This order applers, directors, employees and all persons or entities acting on its behalf, inclunercial fundraisers for charitable purposes soliciting on its behalf. 2. Within 10 days from the date of this order, UDLA will provide a copy a. Every officer, director and employee of UDLA; b. Every governmental entity with which UDLA is required to register conduct charitable solicitations; 	Y PRESTON) California, ies to UDLA, its uding of this order to:

1	a. Provide written confirmation that it is in compliance with this order, including proof
2	of service of the order as required by Item No. 2.
3	b. Provide a copy of every adverse action against it by a governmental entity. This
4	includes every notice of action, regardless of the outcome and all documents
5	reflecting the resolution of the action.
6	"An adverse action by a governmental entity includes, but is not limited to,
7	suspension, revocation or denial of registration, civil or criminal judgment, assessment of a fine, administrative or civil penalty, entry of assurance of
8	voluntary compliance or enforceable settlement agreement or an equivalent action regardless of its title." (Cal. Code Regs., tit. 11, § 999.9.2(b).)
9	c. For each of the following individuals, if the individual is or has in the last 5 years
10	been an officer, director, employee or independent contractor of an entity other than
11	UDLA that holds or solicits charitable assets in California, provide a schedule
12	including the name, address, phone number, website, Registry of Charitable Trusts
13	Registration number, individual's title, beginning and end dates and description of the
14	individual's duties and responsibilities:
15	i. JONATHAN COSSU (AKA JONNY PRESTON).
16	4. Payment of the \$20,000 penalty is due within 30 days unless a timely written appeal of
17	the assessment of penalty is received by the Attorney General. Payment shall be made payable to
18	the California Attorney General.
19	5. Each person identified in Paragraph 3(c), must provide a copy of this order with any
20	application for registration or renewal for any entity that holds or solicits charitable assets in
21	California, with which that person is an officer, director, employee or independent contractor.
22	6. All responses shall be sent to:
23	Alicia Berry, Deputy Attorney General
24	California Department of Justice Office of the Attorney General
25	300 South Spring Street, Suite 1702 Los Angeles, CA 90013
26	(213) 897-7485 (213) 897-7605 (fax)
27	<u>Alicia.Berry@doj.ca.gov</u>
28	

1	7. Failure to comply with the terms of this order constitutes disobedience or resistance to a
2	lawful order pursuant to Government Code section 11455.10. The Attorney General may pursue
3	a contempt sanction of violations pursuant to Government Code section 11455.20, in addition to
4	all other remedies available to the Attorney General.
5	RIGHT TO APPEAL/REQUEST FOR HEARING
6	You have the opportunity to appeal this order and assessment of penalties by filing a
7	written appeal and request for hearing within 30 calendar days of the date of this notice. Filing an
8	appeal does not stay the effect of this order. The appeal procedures are found in California Code
9	of Regulations, title 11, sections 999.6 through 999.8 and are available on the Attorney General's
10	website at: <u>oag.ca.gov/charities/laws</u> .
11	
12	Dated: May 29, 2018
13	ALICIA BERRY
14	Deputy Attorney General Attorney for Complainant
15	For: DAVID ELLER
16	REGISTRAR OF CHARITABLE TRUSTS OFFICE OF THE ATTORNEY GENERAL
17	Complainant
18	
19	LA2018501217
20	<u>52909203.docx</u> 52909203
21	*
22	
23	
24	
25	
26	
27	
28	10
	11

1	APPEAL AND REQUEST FOR HEARING
2	
3	(name),
4	(title/affiliation to registrant) of
5	
6	(organization),
7	requests a hearing of the Attorney General's notice of intent to revoke registration pursuant to
8	Government Code section 12591.1 and California Code of Regulations, title 11, section 999.6.
9	Appellant's address (required):
10	
11	
12	
13	
14	
15	
16	
17	
18	Statement for basis of appeal (required):
19	
20	5
21	
22	
23	
24	N
25	
26	Check this box if you are attaching additional information or documents.
27	*
28	Date Signature
	11

Notice of Intent to Revoke Registration; Order to Cease and Desist (Case 2018-CT0256770)

DECLARATION OF SERVICE BY U.S. MAIL

Case Name: URGENT DOGS OF LA No.: 2018-CT0256770

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service with postage thereon fully prepaid that same day in the ordinary course of business.

On May 30, 2018, I served the attached NOTICE OF INTENT TO REVOKE REGISTRATION AND IMPOSITION OF PENALTIES; ORDER TO CEASE AND DESIST; NOTICE OF ASSESSMENT OF PENALTIES DIRECTED TO URGENT DOGS OF LA AND ITS BOARD OF DIRECTORS by placing a true copy thereof enclosed in a sealed envelope in the internal mail collection system at the Office of the Attorney General at 300 South Spring Street, Suite 1702, Los Angeles, CA 90013, addressed as follows:

Jonathan Cossu 19528 Ventura Blvd., #272 Tarzana, CA 91356

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on May 30, 2018, at Los Angeles, California.

Jane Miyamura Declarant

LA2018501217 52921625.docx