

State of North Carolina Department of the Secretary of State

ELAINE F. MARSHALL SECRETARY OF STATE CHARITABLE SOLICITATION LICENSING

NOTICE OF INTENT TO REVOKE CHARITABLE SOLICITATION LICENSE

CSL FILE NO. 2011 CSL 11629

In the Matter of: Share Our Shoes

Jennifer Pierce, Registered Agent Share Our Shoes 1107 Capital Boulevard Raleigh, NC 27603

FILED: February 9, 2012

The Charitable Solicitation Licensing Division (hereinafter "CSL") of the North Carolina Department of the Secretary of State (hereinafter "Department"), pursuant to authority granted by North Carolina General Statutes Chapter 131F, does hereby issue this Notice of Intent to Revoke the Charitable Solicitation License of Share Our Shoes. Based upon CSL's investigation and information received regarding this matter, the Charitable Solicitation Licensing Division of the North Carolina Department of the Secretary of State hereby gives notice to the licensee of the following findings:

FINDINGS

 The Charitable Solicitation Licensing Division of the North Carolina Department of the Secretary of State is charged with charitable solicitation licensing and enforcement under

- N.C.G.S. Chapter 131-F et. seq. (hereinafter referred to as "the Charitable Solicitation Act") and Title 18, Chapter 11 of the North Carolina Administrative Code.
- 2. Share Our Shoes is a "charitable organization" as defined by N.C.G.S. §131 F-2(3) and is subject to the requirements of the Charitable Solicitation Act.
- Share Our Shoes, originally known as "Shoes-4-Souls, Inc.", registered as a nonprofit
 corporation pursuant to NCGS Chapter 55A on September 3, 2009. This entity subsequently
 changed its legal name to "Share Our Shoes" on March 4, 2010.
- Share Our Shoes currently lists its registered agent in North Carolina Department of the Secretary of State corporation records as Jennifer Pierce.
- 5. Share Our Shoes obtained their initial charitable solicitation license on March 24, 2010.
- Share Our Shoes' currently holds a charitable solicitation license that is set to expire on May 15, 2012.
- 7. Share Our Shoes 2010 IRS Form 990 indicates the organization received \$864,338 in contributions and revenue and incurred \$817,602 in expenses in the 2010 fiscal year.
- 8. On September 7, 2011, CSL received an electronic mail message from Hazem Sider, the owner of Hudda Footwear in Creedmoor, North Carolina. Hudda Footwear purchases and resells used shoes. Mr. Sider alleged in this message that Jennifer Pierce retained proceeds from the sale of shoes belonging to Share Our Shoes for her personal use. CSL Investigator Jason Ricks interviewed Mr. Sider on November 8, 2011 and obtained copies of his records related to shoe transactions Ms. Pierce engaged in on behalf of Share Our Shoes.
- On October 14, 2011, Michael Weddle sent CSL an electronic mail message concerning alleged misconduct by Jennifer Pierce related to Share Our Shoes. Mr. Weddle's message

also alleged that Jennifer Pierce retained proceeds from the sale of shoes belonging to Share Our Shoes for her personal use. Mr. Weddle further alleged that Hope Community Church of Cary donated shoes and five thousand dollars (\$5,000.00) to Share Our Shoes based upon the representation that these shoes would be sent to Haiti. Mr. Weddle further alleged that Jennifer Pierce sold the shoes donated by Hope Community Church to a buyer in New York and they were not sent to Haiti.

- 10. Shortly thereafter, CSL also received information about a local media investigative report concerning alleged misappropriation of shoe and money contributions that Share Our Shoes had recently received from Hope Community Church, in Cary, North Carolina.
- 11. In order to obtain additional information concerning allegations regarding Share Our Shoes alleged misappropriation of contributions from Hope Community Church, on November 2, 2011, CSL sent a records request pursuant to NCGS §131F-23(a) to Share Our Shoes concerning the recent solicitation campaign conducted by Hope Community Church on behalf of the organization with a response deadline of December 2, 2011. More specifically, CSL requested the following information:
 - a. The amount of shoes collected by the Church; and
 - b. The current status or disposition of shoes collected by the Church; and
 - Verified record of the deposit of the five thousand dollars (\$5,000.00) cash donation received; and
 - d. Detailed explanation stating how Share Our Shoes appropriately applies contributions of goods (specifically shoes) and monies collected from all sources to the organization's stated charitable purpose.

- On December 6, 2011, CSL received a response from Share Our Shoes to the November 2,
 2011 records request.
- 13. In order to obtain additional information concerning Share Our Shoes solicitation and expenditure of contributions, on November 10, 2011, CSL sent a second records request to Share Our Shoes pursuant to NCGS §131F-23(a) concerning the organization's operations since its inception on September 3, 2009. The original response deadline of January 10, 2012 was later extended until January 18, 2012 upon request for an extension by the organization. The following information was requested:
 - a. Bank account information and bank statements for all accounts; and
 - b. Explanation of items on the organization's 2010 IRS Form 990; and
 - c. Treasurer's reports; and
 - d. Policies and procedures concerning individuals authorized to engage in financial transactions on behalf of the organization; and
 - e. Policies and procedures concerning internal controls of the organization; and
 - f. Detailed financial information regarding all transactions wherein donated shoes were sold to another entity; and
 - g. Detailed information regarding shoe shipments; and
 - h. Detailed information regarding shoe distribution events; and
 - i. Total amount of cash contributions received; and
 - Total amount of in-kind contributions received in the form of shoes or other items; and
 - k. Copy of all coventure agreements between the organization and any third party;
 and

- 1. Amount of wages earned or salary paid to Jennifer Pierce; and
- m. Amount of business reimbursement received by Jennifer Pierce; and
- n. List of all paid employees and amounts paid to them during the course of their employment; and
- o. Contact information for board members Michael Richard and Evangeline Bullock.
- 14. On January 18, 2012, Share Our Shoes delivered an incomplete response to CSL's November 10, 2011 records request. Specifically, the organization failed to provide complete information in response to the following questions:
 - a. A detailed explanation of items included in the category identified as "Program Materials" on the 2010 IRS Form 990 for the organization "Share Our Shoes". This item is listed in Part IX, line 24a of the Form 990 and indicates expenditures for "Program Materials" in the amount of \$599,660.00 during FY 2010.
 - i. Describe the types of materials included in the "Program Materials" line item and what they were used for by the organization during FY 2010.
 - ii. Provide documentation of all purchases of "Program Materials" including vendor information and what items were purchased from each vendor during FY 2010.
 - b. Copies of any policies or procedures for "Share Our Shoes"/"Shoes-for-Souls" regarding which individuals in the organization were authorized to engage in financial transactions on behalf of the organization and any information related to internal controls the organization had in place regarding the movement of money and shoes within the organization and dates during which all such policies and procedures were in effect.
 - c. A list of shoe shipments made by "Shoes-for-Souls" or "Share Our Shoes" at any time during the existence of this organization under either name including the date of shipment, entity/location to which the shoes were shipped, and the amount of shoes in each shipment.
 - d. A list of all shoe distribution events sponsored by "Shoes-for-Souls" or "Share Our Shoes" at any time during the existence of this organization under either name including the date, location, any sponsoring partners, persons/groups/audience who received shoes, and total amount of shoes distributed at each event.

- e. Total amount of monetary contributions received by "Shoes-for-Souls" or "Share Our Shoes" at any time during the existence of this organization under either name.
- f. Total amount of in-kind contributions received by "Shoes-for-Souls" or "Share Our Shoes" at any time during the existence of this organization under either name.
- g. Amount of reimbursement for business expenses received by Jennifer Pierce during her employment with "Shoes-for-Souls" or "Share Our Shoes" at any time during the existence of this organization under either name.
- h. Copies of any Treasurer Reports in existence for the life of "Shoes-for-Souls" and "Share Our Shoes".
- 15. Review of bank statements provided by Share Our Shoes reveals a total of four (4) bank accounts and one (1) Pay-Pal account that were active at some time between September 3, 2009 and January 18, 2012. The bank accounts are as follows:
 - a. Wachovia checking account ending in 0815
 - b. Wachovia checking account ending in 1894
 - c. Capital Bank checking account ending in 6707
 - d. Capital Bank checking account ending in 3926
 - e. Pay-Pal Account "Shoes4souls@yahoo.com"
- 16. Share Our Shoes' bank statements indicate that the following persons engaged in financial transactions associated with at least one of the Share Our Shoes bank accounts at some time between September 3, 2009 and January 18, 2012:
 - a. Jennifer Lynn Pierce
 - b. Debra Chadwick
 - c. Nelson C. Perry
 - d. Mark Harvey
 - e. Jimmy Carroll

- f. Michael Richard
- g. Brian Pearl
- h. Tara Lowman
- 17. As of the date of this Notice, CSL has identified in Share Our Shoes' bank statements for Wachovia account 0815 one hundred sixteen (116) separate point of sale and/or automated withdrawal transactions totaling ten thousand nine hundred seventy-five dollars and twelve cents (\$10,975.12) in expenditures that may not have furthered the charitable purpose of Share Our Shoes. See attached Exhibit A for details.
- 18. As of the date of this Notice, CSL has identified in Share Our Shoes' bank statements for Capital account 6707 two hundred fifty-seven (257) separate point of sale and/or automated withdrawal transactions totaling nine thousand seven hundred seventy-nine and four cents (\$9,779.04) in expenditures that may not have furthered the charitable purpose of Share Our Shoes. See attached Exhibit B for details.
- 19. As of the date of this Notice, CSL has identified in Share Our Shoes' bank statements for Capital account 6707 one hundred twenty-three (123) checks written to individuals serving on the Board of Directors, businesses associated with those individuals, and others totaling forty-seven thousand three hundred fifty-nine dollars and seventy-eight cents (\$47,359.78) in expenditures that may not have furthered the charitable purpose of Share Our Shoes. See attached Exhibit C for details.
- 20. Memo line information on Share Our Shoes Capital Bank account 6707 checks reference petty cash, reimbursements, and payments for labor and contract work provided. There are at least thirty-six checks written for the purpose of "Petty Cash" totaling seven thousand one

- hundred fourteen dollars and seventy-five cents (\$7,114.75). See attached Exhibit C for details.
- 21. Share Our Shoes' bank statements include point of sale transactions at restaurants including but not limited to McDonalds, Cook-Out, Outback, The Pour House, and Tir Na Nog totaling one thousand ninety-one dollars and twenty-five cents (\$1,091.25). See attached Exhibit D for details.
- 22. Share Our Shoes' bank statements include point of sale transactions at gas stations and convenience stores including but not limited to ExxonMobil, Handee Hugos, C Mini Mart and A&M Mini Mart totaling two thousand five hundred fifty-four dollars and sixty-eight cents (\$2,554.68). See attached Exhibit E for details.
- 23. Share Our Shoes' bank statements include point of sale transactions at entertainment venues including Regal North Hills and Buffaloe Lanes totaling one hundred ninety-three dollars and forty-four cents (\$193.44). See attached Exhibit F for details.
- 24. Share Our Shoes' bank statements include point of sale transactions at retail stores including but not limited to Wal Mart, Target, Wet Seal, Nash County ABC, Perfumania, Bealls-Outlet of Florida, and Rainbow totaling five thousand two hundred ninety-four dollars and ninety-nine cents (\$5,294.99). See attached Exhibit G for details.
- 25. Share Our Shoes' bank statements include point of sale transactions at personal service providers including but not limited to Mitchells Hairstyling, Crystal Nails, TMI Nails, B Nail Spa, Diva Nails, Teeth Whitening, and Bella Tanning totaling three hundred ninety-eight dollars (\$398.00). See attached Exhibit H for details.
- 26. Share Our Shoes' bank statements include miscellaneous point of sale transactions at entities including but not limited to Holiday Inn, US Airways, and the Vijay Patel Family totaling

- eight hundred twenty-eight dollars and forty cents (\$828.40). See attached Exhibit I for details.
- 27. Share Our Shoes' bank statements include records of counter withdrawals totaling seven thousand dollars (\$7,000.00). See attached Exhibit J for details.
- 28. Share Our Shoes' bank statements include records of automated teller machine withdrawal totaling three thousand three hundred ninety-three dollars and forty cents (\$3,393.40). See attached Exhibit K for details.
- 29. Based upon records provided by Share Our Shoes, the organization received one hundred forty-eight thousand seven hundred fifty-seven dollars and seven cents (\$148,757.07) for donated shoes sold in 2010 and one hundred ninety-three thousand ninety-five dollars (\$193,095.00) for donated shoes sold in 2011. See attached Exhibit L for details.
- 30. Share Our Shoes Board of Directors Meeting Minutes provide incomplete information concerning the selection, resignation, and removal of members of the board of directors.
 Some major actions that are mentioned in other parts of Share Our Shoes' response are not reflected in the meeting minutes.
- 31. Share Our Shoes Board of Directors Meeting Minutes are unclear and do not include sufficient detail to determine if the organization has acted within the scope of its Articles of Incorporation and Bylaws between September 3, 2009 and January 18, 2012.
- 32. Share Our Shoes' response failed to provide any information concerning internal controls the organization had in place regarding the movement of money and shoes within the organization.
- 33. Share Our Shoes' response indicates that as of January 18, 2012, the organization has only one member of the Board of Directors, Elvia Gerdes.

- 34. Share Our Shoes' response includes evidence from Wachovia account 0851 and Capital account 6707 indicating sixty-eight thousand one hundred thirteen dollars and ninety-four cents (\$68,113.94) in assets and/or contributions for which no proof has been provided that these monies were applied in a manner substantially consistent with the purpose for which they were solicited.
- 35. Based upon a preponderance of the evidence cited in this Notice, the Department through CSL has concluded that there is a substantial likelihood that Share Our Shoes has failed to apply contributions in a manner substantially consistent with the purpose for which they were solicited based upon bank statements and information provided by Share Our Shoes concerning the organization's operations and financial controls between September 3, 2009 and January 18, 2012 in violation of N.C.G.S. §131F-20(18).

APPLICABLE LAW

- The Department possesses jurisdiction over the subject matter of this Notice of Intent to Revoke Charitable Solicitation License and the Respondent. N.C.G.S. §131F et. seq.
- 2. The Department through CSL has the authority to conduct investigations into matters where it is alleged or appears that the Charitable Solicitation Act, any relevant Rule, or any Order has been violated. N.C.G.S. §131F-23(a)
- 3. The Department through CSL may impose one or more of the penalties listed in N.C.G.S. §131F-23(e) upon a charitable organization that has violated any of the provisions of the Charitable Solicitation Act or relevant Rules in the North Carolina Administrative Code. N.C.G.S. §131F-23(d)
- 4. The Department, through CSL, must provide notice to the licensee prior to the commencement of any proceedings for the suspension, revocation, annulment, withdrawal,

recall, cancellation or amendment of any license pursuant to the provisions of N.C.G.S. §150B-23. N.C.G.S. §150B-3(b)

Based upon the foregoing findings and applicable law, the Department hereby enters the following:

NOTICE OF INTENT TO REVOKE CHARITABLE SOLICITATION LICENSE

- 1. Share Our Shoes is hereby given official notice of the intent of the Department through CSL to revoke the organization's charitable solicitation license pursuant to N.C.G.S. §131F-23(e)(3) ten (10) days following receipt of this Notice unless the following conditions are satisfied:
 - a. Share Our Shoes shall provide sufficient information verifying that <u>all</u> expenditures listed in attached Exhibits K, L, and M were made in a manner substantially consistent with the charitable purpose for which they were solicited. Share Our Shoes shall provide such information to CSL verifying the charitable purpose of listed expenditures utilizing the format provided in Exhibits M, N, and O; and
 - b. Share Our Shoes shall provide complete responses to <u>all</u> questions included in the November 10, 2011 records request for which no response has been filed as listed in Exhibit P attached to this Notice.
- 2. Share Our Shoes written response to the inquiries described in Number 1. Parts a. and b. shall include the following notarized verification statement:

[&]quot;I, (print name of organization official signing below), being first duly sworn, depose and say under penalty of perjury with regard to the investigation being conducted by the Department of the North Carolina Secretary of State Charitable Solicitation Licensing Division concerning (insert name or organization) that the information submitted herein in response to the records request issued on (insert date records request sent) is true,

accurate,	and	complete to) the	knowledge	of the	(insert	name	of o	rganization)	official
named be	low.									

	Signature of organization official	
	Title of organization official (Insert name of organization)	23
Sworn to and subscribed before me,		
This the day of	, 2012.	
Notary Public		
My commission expires:	"	

3. Share Our Shoes written responses shall be sent to the following address no later than ten (10) days following receipt of this Notice:

For U.S. Mail regular delivery, use the following address: Jason Ricks, Investigator
North Carolina Department of the Secretary of State
Charitable Solicitation Licensing Division
PO Box 29622
Raleigh, NC 27626-0622

For overnight mail, use the following address: Jason Ricks, Investigator North Carolina Department of the Secretary of State Charitable Solicitation Licensing Division 2 South Salisbury Street Raleigh, NC 27601

- 4. Failure to provide any response as requested in this Notice shall constitute immediate grounds for the Department through CSL to revoke Share Our Shoes' charitable solicitation license under its enforcement authority delineated in N.C.G.S. §131F-23.
- 5. CSL reserves the right to assess additional penalties in this matter pursuant to its enforcement authority delineated in N.C.G.S. §131F-23.

NOTICE IS HEREBY GIVEN, this the		February	, 2012
NORTH CAROLINA DEPARTMENT OF	F THE SECRETAR	Y OF STATE	

By: Heather L. Black, Director

CHARITABLE SOLICITATION LICENSING DIVISION



State of North Carolina Department of the Secretary of State

ELAINE F. MARSHALL SECRETARY OF STATE CHARITABLE SOLICITATION LICENSING

VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED
VIA EMAIL SEIDEL@SEIDELGAMBER.COM

February 17, 2012

Robert Seidel Seidel Gamber PLLC 5322 Highgate Drive Suite 241 Durham, NC 27713

RE: 2011 CSL 11629 - Share Our Shoes

SUPPLEMENTAL RECORDS REQUEST FROM NC DEPARTMENT OF THE SECRETARY OF STATE CHARITABLE SOLICITATION LICENSING DIVISION PURSUANT TO NCGS §131F-23

Dear Mr. Seidel:

Pursuant to our conversation on February 15, 2012, the Department of the Secretary of State Charitable Solicitation Licensing Division (hereinafter "CSL") has duly noted in the Share Our Shoes case file that you are currently serving as counsel of record on behalf of this entity. Therefore, CSL will only communicate with you directly concerning any matters related to this case until such time as we receive official notice that you are no longer counsel of record.

During our phone conversation, Share Our Shoes employee Jennifer Pierce left me a voicemail message requesting an electronic copy of Exhibits M, N, and O that were attached to the Notice of Intent to Revoke Charitable Solicitation License served at Share Our Shoes physical address on February 9, 2012. CSL will provide Share Our Shoes an electronic copy of the blank spreadsheets requesting information concerning specific financial transactions. I have transmitted them to you via electronic mail at the above listed email address. CSL requests that you please inform Ms. Pierce that I have responded to her request and transmitted Exhibits M, N, and O directly to you.

Ms. Pierce also inquired if original documents submitted by Share Our Shoes to CSL in response to the records request would be returned. Please be aware that CSL <u>WILL NOT</u> return any documents submitted by Share Our Shoes in response to the records request. Therefore, Share Our Shoes should consider making copies for itself of any original documents that will be included as part of the organization's response to the records request.

During our conversation, we also spoke about in kind contributions to Share Our Shoes from Bob Barker Company, Inc received in 2010 and 2011. These contributions were not specifically addressed in the Notice of Intent to Revoke Charitable Solicitation License. Please find attached to this letter a spreadsheet provided by Bob Barker Company, Inc. listing the number and type of items contributed, their monetary value, and the "intended cause" for which they were donated.

Please provide a written response to the following questions concerning the solicitation and subsequent disposition of in-kind contributions from Bob Barker Company, Inc. as listed on the attached spreadsheet. Share Our Shoes' response to the above questions concerning Bob Barker Company, Inc.'s in-kind contributions to the organization in 2010 and 2011 should be provided at the same time and along with the organization's response to information requested in the Notice of Intent to Revoke Charitable Solicitation License that is due on **Monday, February 20, 2012.**

- 1. Did Share Our Shoes actively solicit shoes donated by Bob Barker Company, Inc. in May/June 2010? If yes, how was the solicitation made, e.g., face to face, mail, e-mail, etc.? Provide a list of all persons and their contact information involved in making any such face to face solicitation.
- 2. Did Share Our Shoes represent to Bob Barker Company, Inc. that donated shoes would be used for the charitable purpose of assisting persons residing in Haiti? If yes, how was the solicitation made, e.g., face to face, mail, e-mail, etc.? Provide a list of all persons and their contact information involved in making any such face to face solicitation.
- 3. Did Share Our Shoes represent to Bob Barker Company, Inc. that donated shoes would be used for any specific charitable purpose other than assisting persons residing in Haiti? If yes, how was the solicitation made, e.g., face to face, mail, e-mail, etc.? Provide a list of all persons and their contact information involved in making any such face to face solicitation.
- 4. Provide information and copies of all existing documentation verifying shoes donated by Bob Barker Company, Inc. in May/June 2010 were directed to the "intended cause" of "Haiti Earthquake"? If no such documentation exists, please indicate such.
- 5. Provide information and copies of all existing documentation concerning the disposition of all shoes donated by Bob Barker Company, Inc. in May/June 2010 as described on the attached list.
- 6. Did Share Our Shoes actively solicit medical supplies donated by Bob Barker Company, Inc. in May 2011? If yes, how was the solicitation made, e.g., face to face, mail, e-mail, etc.? Provide a list of all persons and their contact information involved in making any such face to face solicitation.
- 7. Did Share Our Shoes represent to Bob Barker Company, Inc. that donated medical supplies would be used for the charitable purpose of assisting with relief efforts for the tsunami in Japan or Nashville floods? If yes, how was the solicitation made, e.g., face to face, mail, e-mail, etc.? Provide

a list of all persons and their contact information involved in making any such face to face solicitation.

- 8. Did Share Our Shoes represent to Bob Barker Company, Inc. that donated medical supplies would be used for any specific charitable purpose other than Japanese tsunami and Nashville flood relief?
- 9. Provide information and copies of all existing documentation verifying medical supplies donated by Bob Barker Company, Inc. in May 2011 were directed to the "intended cause" of "Tsunami/Nashville Floods"? If no such documentation exists, please indicate such.
- 10. In what way and to what extent did Bob Barker Company, Inc.'s contribution of medical supplies in May 2011 further the charitable purpose of Share Our Shoes?
- 11. Provide information and copies of all existing documentation concerning the disposition of all medical supplies donated by Bob Barker Company, Inc. in May 2011 as described on the attached list.

Along with the response due on **Monday**, **February 20**, **2012**, Share Our Shoes may choose to provide any other information which shows compliance with all requirements for the organization's retention of their charitable solicitation license.

Share Our Shoes written response to the records request contained in this letter, records request in the Notice of Intent to Revoke Charitable Solicitation License, and any other additional information provided by the organization shall include the following notarized verification statement:

"I, (print name of organization official signing below), being first duly sworn, depose and say under penalty of perjury with regard to the investigation being conducted by the Department of the North Carolina Secretary of State Charitable Solicitation Licensing Division concerning (insert name or organization) that the information submitted herein in response to the records request issued on (insert date records request sent) is true, accurate, and complete to the knowledge of the (insert name of organization) official named below.

		Signature of organization official					
		Title of organization official (Insert name of organization)					
Sworn to and	subscribed before	me,					
This the	day of	, 2012.					
Notary Public							
My commission	n expires:	n					

Share Our Shoes written responses shall be delivered to the following address no later than **Monday**, **February 20, 2012:**

For U.S. Mail regular delivery, use the following address: Jason Ricks, Investigator
North Carolina Department of the Secretary of State
Charitable Solicitation Licensing Division
PO Box 29622
Raleigh, NC 27626-0622

For overnight mail, use the following address: Jason Ricks, Investigator North Carolina Department of the Secretary of State Charitable Solicitation Licensing Division 2 South Salisbury Street Raleigh, NC 27601

To Hardner

Following a review of the evidence of record, CSL will make a determination concerning whether Share Our Shoes has violated any section of NCGS Chapter 131F, the Charitable Solicitation Act, and whether such violation(s) warrant the assessment of any civil penalties up to and including license revocation pursuant to NCGS §131F-23(e).

Please let me know if you have any questions or need further information regarding this matter by calling me directly at (919) 807-2129 or via email at sgardner@sosnc.com.

Sincerely,

Scarlette Gardner

Attorney & Enforcement Supervisor

Detail of Share our Shoes Donations Period 2010 -2011

				Extended	Donation	Approx	
Item #	Item Description	Qty	Cost (ea)	Cost	Туре	Donation Date	Intended Cause
255LB-NV-10	Shoe, Deck Low Back Navy	1,626	\$2.15	\$3,495.90	Footwear	May/June 2010	Haiti Earthquake
255LB-NV-11	Shoe, Deck Low Back Navy	1,512	\$2.15	\$3,250.80	Footwear	May/June 2010	Haiti Earthquake
255LB-NV-12	Shoe, Deck Low Back Navy	984	\$2.15	\$2,115.60	Footwear	May/June 2010	Haiti Earthquake
255LB-NV-13	Shoe, Deck Low Back Navy	437	\$2.15	\$939.55	Footwear	May/June 2010	Haiti Earthquake
255LB-NV-14	Shoe, Deck Low Back Navy	166	\$2.15	\$356.90	Footwear	May/June 2010	Haiti Earthquake
255LB-NV-9	Shoe, Deck Low Back Navy	1,974	\$2.15	\$4,244.10	Footwear	May/June 2010	Haiti Earthquake
255LB-NV-7	Shoe, Deck Low Back Navy	559	\$2.15	\$1,201.85	Footwear	May/June 2010	Haiti Earthquake
255LB-NV-6	Shoe, Deck Low Back Navy	285	\$2.15	\$612.75	Footwear	May/June 2010	Haiti Earthquake
255LB-OR-10	Shoe, Deck Low Back Orange	1,152	\$2.15	\$2,476.80	Footwear	May/June 2010	Haiti Earthquake
255LB-OR-11	Shoe, Deck Low Back Orange	840	\$2.15	\$1,806.00	Footwear	May/June 2010	Haiti Earthquake
255LB-OR-13	Shoe, Deck Low Back Orange	260	\$2.15	\$559.00	Footwear	May/June 2010	Haiti Earthquake
255LB-OR-14	Shoe, Deck Low Back Orange	96	\$2.15	\$206.40	Footwear	May/June 2010	Haiti Earthquake
255LB-OR-9	Shoe, Deck Low Back Orange	888	\$2.15	\$1,909.20	Footwear	May/June 2010	Haiti Earthquake
255LB-OR-7	Shoe, Deck Low Back Orange	269	\$2.15	\$578.35	Footwear	May/June 2010	Haiti Earthquake
255LB-OR-5	Shoe, Deck Low Back Orange	66	\$2.15	\$141.90	Footwear	May/June 2010	Haiti Earthquake
3405	Clean & Clear Acne Treatments	36	\$24.84	\$894.24	Healthcare	May 2011	Tsunami/Nashville Floods
2725	Hand Wash, Dial Complete Foam	13	\$18.60	\$241.80	Healthcare	May 2011	Tsunami/Nashville Floods
42148	Anacin, 2 tablets/pk	11	\$9.60	\$105.60	Healthcare	May 2011	Tsunami/Nashville Floods
9.98	Toothbrush, Reach Wonder Grip	15	\$133.20	\$1,998.00	Healthcare	May 2011	Tsunami/Nashville Floods
9624	Hand Sanitizer, Purell 3 oz	137	\$40.46	\$5,543.02	Healthcare	May 2011	Tsunami/Nashville Floods
BIO75-Q	Bioshield 75 Quart	29	\$169.15	\$4,905.35	Healthcare	May 2011	Tsunami/Nashville Floods
FS15	Soap, Freshscent Wrapped #1.5	26	\$27.84	\$723.81	Healthcare	May 2011	Tsunami/Nashville Floods
HC00004	Corn Cushions	48	\$7.56	\$362.88	Healthcare	May 2011	Tsunami/Nashville Floods
HC00174	Ear Wax Removal Kit	105	\$2.00	\$210.00	Healthcare	May 2011	Tsunami/Nashville Floods
HC009	Electrolyte Fruit Flavor 1 Liter	1	\$17.36	\$17.36	Healthcare	May 2011	Tsunami/Nashville Floods
HC1122	Ointment, A&D, 4 oz fliptop	57	\$5.71	\$325.38	Healthcare	May 2011	Tsunami/Nashville Floods
HC1505	Adhesive Tape Remover Pads	19	\$2.78	\$52.82	Healthcare	May 2011	Tsunami/Nashville Floods
HC2460	Glove Surgeon Latex Sz 6	96	\$13.00	\$1,248.00	Healthcare	May 2011	Tsunami/Nashville Floods
HC2465	Glove Surgeon Latex Sz 6.5	96	\$13.00	\$1,248.00	Healthcare	May 2011	Tsunami/Nashville Floods
HC2470	Glove Surgeon Latex Sz 7.0	96	\$13.00	\$1,248.00	Healthcare	May 2011	Tsunami/Nashville Floods
HC2475	Glove Surgeon Latex Sz 7.5	96	\$13.00	\$1,248.00	Healthcare	May 2011	Tsunami/Nashville Floods
HC2480	Glove Surgeon Latex Sz 8.0	96	\$13.00	\$1,248.00	Healthcare	May 2011	Tsunami/Nashville Floods
HC2485	Glove Surgeon Latex Sz 8.5	96	\$13.00	\$1,248.00	Healthcare	May 2011	Tsunami/Nashville Floods
HC2490	Glove Surgeon Latex Sz 9.0	96	\$13.00	\$1,248.00	Healthcare	May 2011	Tsunami/Nashville Floods
HC255050	Oragel, Regular Strength	263	\$2.99	\$786.37	Healthcare	May 2011	Tsunami/Nashville Floods
HC33-340	Lab Jacket, White M	30	\$7.34	\$220.30	Healthcare	May 2011	Tsunami/Nashville Floods
HC33-360	Lab Jacket, White L	29	\$7.94	\$230.36	Healthcare	May 2011	Tsunami/Nashville Floods
HC33-380	Lab Jacket, White XL	30	\$8.33	\$250.00	Healthcare	May 2011	Tsunami/Nashville Floods
HC33-390	Lab Jacket, White 2XL	30	\$7.68	\$230.30	Healthcare	May 2011	Tsunami/Nashville Floods

HC34-120	Lab Coat, Blue S	30	\$4.69	\$140.60	Healthcare	May 2011	Tsunami/Nashville Floods
HC34-140	Lab Coat, Blue M	30	\$6.21	\$186.30	Healthcare	May 2011	Tsunami/Nashville Floods
HC34-160	Lab Coat, Blue L	29	\$7.46	\$216.24	Healthcare	May 2011	Tsunami/Nashville Floods
HC34-180	Lab Coat, Blue XL	27	\$7.69	\$207.54	Healthcare	May 2011	Tsunami/Nashville Floods
HC34-190	Lab Coat, Blue 2XL	30	\$6.52	\$195.60	Healthcare	May 2011	Tsunami/Nashville Floods
HC34452	Saniwash, 16 oz Pump Bottle	24	\$43.97	\$1,055.36	Healthcare	, May 2011	Tsunami/Nashville Floods
HC39-20	Face Mask, Blue w/ earloop	1,800	\$2.82	\$5,078.34	Healthcare	May 2011	Tsunami/Nashville Floods
HC39-30	Face Mask, Blue w/Face Shield	168	\$10.78	\$1,810.48	Healthcare	May 2011	Tsunami/Nashville Floods
HC4271	Urinary Drainage Bag	6	\$21.00	\$126.00	Healthcare	May 2011	Tsunami/Nashville Floods
HC4282	Urinary Leg Bag	11	\$6.00	\$66.00	Healthcare	May 2011	Tsunami/Nashville Floods
HC4429	Perineal Skin Protectant	25	\$58.88	\$1,472.00	Healthcare	May 2011	Tsunami/Nashville Floods
HC4460	3 in 1 Wash Cream	21	\$45.28	\$950.88	Healthcare	May 2011	Tsunami/Nashville Floods
HC4600	Hand Gel, Freshmmnt Alcohol	339	\$21.00	\$7,119.00	Healthcare	May 2011	Tsunami/Nashville Floods
HC5101	Oxygen Tubing	9	\$13.55	\$121.95	Healthcare	May 2011	Tsunami/Nashville Floods
HC5205	Tubing, Oxygem Cannulated Unflared	2	\$15.95	\$31.90	Healthcare	May 2011	Tsunami/Nashville Floods
HC5302	Tubing, Oxygen Masks 7'	9	\$31.25	\$281.25	Healthcare	May 2011	Tsunami/Nashville Floods
HC7112	Ointment, Diaper Rash	6	\$53.94	\$323.64	Healthcare	May 2011	Tsunami/Nashville Floods
HC7113	Ointment, Bengay Pain	409	\$5.34	\$2,184.06	Healthcare	May 2011	Tsunami/Nashville Floods
HC7114	Powder, Gold Bond Medicated	12	\$123.12	\$1,477.44	Healthcare	May 2011	Tsunami/Nashville Floods
HC7115	Prilosec OTC, 28 count	424	\$19.20	\$8,140.80	Healthcare	May 2011	Tsunami/Nashville Floods
HC7116	Metamucil Wafer, Apple 12 ct	102	\$46.68	\$4,761.36	Healthcare	May 2011	Tsunami/Nashville Floods
HC96500	Mask, N95 Particulate Respirator	200	\$65.00	\$13,000.00	Healthcare	May 2011	Tsunami/Nashville Floods
HCD0011	Hydrogen Peroxide * oz	12	\$4.92	\$59.04	Healthcare	May 2011	Tsunami/Nashville Floods
HS-01	Dispenser, Touchless for alcohol or non alco	3	\$15.00	\$45.00	Healthcare	May 2011	Tsunami/Nashville Floods
HS124	Hand Sanitizer, Alcohol, Touchless	14	\$36.00	\$504.00	Healthcare	May 2011	Tsunami/Nashville Floods
HS21	Hand Sanitizer, Touchless	5	\$30.00	\$150.00	Healthcare	May 2011	Tsunami/Nashville Floods
J91298	Soap, Antibacterial Hand	34	\$34.23	\$1,163.82	Healthcare	May 2011	Tsunami/Nashville Floods
NPF-M	Gloves, Nitrile Exam Sz M	1	\$45.50	\$45.50	Healthcare	May 2011	Tsunami/Nashville Floods
SEN100	Senna Tablets	9	\$27.12	\$244.08	Healthcare	May 2011	Tsunami/Nashville Floods
SU452	Conditioner, Dandruff Sulfur	5	\$10.52	\$52.62	Healthcare	May 2011	Tsunami/Nashville Floods
<u>SU456</u>	Shampoo, Dandruff_Sulfur	3	\$22.50	\$67.51	Healthcare	May 2011	Tsunami/Nashville Floods

NOTICE OF LIMITED REPRESENTATION AND REQUEST FOR EXTENSION OF TIME TO RESPOND

CSL File No.: 2001 CSL 11629

TO: Scarlette Gardner, Attorney

Charitable Solicitation Licensing Division

NC Secretary of State

PO Box 29622

Raleigh, NC 27626-0622

Via Facsimile (919) 807-2220

and United States Mail

RE: Share Our Shoes

PLEASE TAKE NOTICE that Seidel Gamber, PLLC has been retained by Share Our Shoes to represent its interests in the limited capacity of assisting Share Our Shoes in responding to certain requests for information contained in the Notice of Intent to Revoke Charitable Solicitation License, Dated February 9, 2012, and served upon Share Our Shoes by the Charitable Solicitation Licensing Division of the North Carolina Secretary of State. At this time, Seidel Gamber, PLLC is not representing Share Our Shoes in any other matter or in any other capacity.

FURTHER, as counsel for Share Our Shoes for the limited purpose of assisting Share Our Shoes as outlined herein, I respectfully request of the Charitable Solicitation Licensing Division of the North Carolina Secretary of State an extension of time of seven (7) days from February 20, 2012 to complete and deliver to the Charitable Solicitation Licensing Division of the North Carolina Secretary of State Share Our Shoe's responses to information requested in the Notice of Intent to Revoke Charitable Solicitation License, Dated February 9, 2012. It is my belief that a seven (7) day extension until Monday, February 27, 2012 will be sufficient time for Share Our Shoes to respond to information requested in the Notice of Intent to Revoke Charitable Solicitation License, Dated February 9, 2012.

I respectfully await your decision.

This 17th day of February, 2012.

SEIDEL GAMBER, PLLC

Robert R. Seidel

Counsel for Share Our Shoes 5322 Highgate Drive, Suite 241

Durham, NC 27713

Telephone: (919) 237-3405

CERTIFICATE OF SERVICE

I, Robert R. Seidel of Seidel Gamber, PLLC, counsel for Share Our Shocs, hereby certify that I served the foregoing Notice of Limited Representation and Request for Extension of Time to Respond upon the Charitable Solicitation Licensing Division of the North Carolina Secretary of State through its counsel as shown below by facsimile and by depositing a copy thereof in the United States Mail, first class, postage prepaid, and addressed as follows:

Scarlette Gardner
Counsel for Charitable Solicitation Licensing Division
Department of the Secretary of State
Post Office Box 29622
Raleigh, North Carolina 27626-0622

Facsimile: (919) 807-2220

This 17th day of February, 2012.

SCIDEL GAMBER, PLLC

Robert R. Seidel



State of North Carolina Department of the Secretary of State

ELAINE F. MARSHALL SECRETARY OF STATE CHARITABLE SOLICITATION LICENSING

VIA CERTIFIED MAIL RETURN RECEIPT REQUEST

February 20, 2012

Mr. Robert R. Seidel Seidel Gamber, PLLC 5322 Highgate Drive, Suite 241 Durham, NC 27713

RE: 2011 CSL 11629 – Share Our Shoes - Request for Extension of Time to File Responses to the Department's Requests for Additional Information

Dear Mr. Seidel:

The North Carolina Department of the Secretary of State Charitable Solicitation Licensing Division (CSL) is in receipt of your letter on behalf of Share Our Shoes dated February 17, 2012 requesting a seven days extension of time until February 27, 2012 to complete and deliver to CSL a response to the following requests for information from the Department:

- 1. Request for additional information included in the February 9, 2012 Notice of Intent to Revoke Charitable Solicitation License; and
- 2. Request for additional information included in the February 17, 2012 letter entitled "Supplemental Records Request".

The Department HEREBY GRANTS Share Our Shoes a one-time extension of time to complete and deliver their response to the above listed requests for additional information until Monday, February 27, 2012 at 5:00pm. Share Our Shoes' response in its entirety must be received by the Department no later than this newly established deadline.

Please let me know if you have any questions or need further information regarding this matter.

Sincerely, Scarletto Hardra

Scarlette Gardner

Attorney & Enforcement Supervisor