

SUMMONS - CIVIL

STATE OF CONNECTICUT
SUPERIOR COURT
www.jud.ct.gov

See page 2 for instructions

JD-CV-1 Rev. 2-13
C.G.S. §§ 51-346, 51-347, 51-349, 51-350, 52-45a,
52-48, 52-259, P.B. Secs. 3-1 through 3-21, 8-1

TO: Any proper officer; BY AUTHORITY OF THE
STATE OF CONNECTICUT, you are hereby
commanded to make due and legal service of
this Summons and attached Complaint.

- "X" if amount, legal interest or property in demand, not including interest and costs is less than \$2,500.
- "X" if amount, legal interest or property in demand, not including interest and costs is \$2,500 or more.
- "X" if claiming other relief in addition to or in lieu of money or damages.

Address of court clerk where writ and other papers shall be filed (Number, street, town and zip code) (C.G.S. §§ 51-346, 51-350) 95 Washington Street, Hartford, 06106	Telephone number of clerk (with area code) (860) 548-2700	Return Date (Must be a Tuesday) February 18, 2014 <small>Month Day Year</small>
<input checked="" type="checkbox"/> Judicial District <input type="checkbox"/> G.A. Number: <input type="checkbox"/> Housing Session <input type="checkbox"/> Number:		At (Town in which writ is returnable) (C.G.S. §§ 51-346, 51-349) Hartford
		Case type code (See list on page 2) Major: M Minor: 00

For the Plaintiff(s) please enter the appearance of:

Name and address of attorney, law firm or plaintiff if self-represented (Number, street, town and zip code) Gary W. Hawes, AAG, Office of the Attorney General, 55 Elm Street, Hartford, 06106	Juris number (to be entered by attorney only) 415091
Telephone number (with area code) (860) 808-5020	Signature of Plaintiff (If self-represented)

Number of Plaintiffs: **1** Number of Defendants: **1** Form JD-CV-2 attached for additional parties

Parties	Name (Last, First, Middle Initial) and Address of Each party (Number; Street; P.O. Box; Town; State; Zip; Country, if not USA)	ID
First Plaintiff	Name: Jepsen, George, Attorney General Address: State of Connecticut, Office of Attorney General, 55 Elm Street, P.O. Box 120, Hartford, CT 06141-0120	P-01
Additional Plaintiff	Name: Address:	P-02
First Defendant	Name: Doc Hurley Scholarship Foundation, Inc. Address: 289 Ridgefield Street, Hartford, CT 06112	D-01
Additional Defendant	Name: Address:	D-02
Additional Defendant	Name: Address:	D-03
Additional Defendant	Name: Address:	D-04

Notice to Each Defendant

- YOU ARE BEING SUED.** This paper is a Summons in a lawsuit. The complaint attached to these papers states the claims that each plaintiff is making against you in this lawsuit.
- To be notified of further proceedings, you or your attorney must file a form called an "Appearance" with the clerk of the above-named Court at the above Court address on or before the second day after the above Return Date. The Return Date is not a hearing date. You do not have to come to court on the Return Date unless you receive a separate notice telling you to come to court.
- If you or your attorney do not file a written "Appearance" form on time, a judgment may be entered against you by default. The "Appearance" form may be obtained at the Court address above or at www.jud.ct.gov under "Court Forms."
- If you believe that you have insurance that may cover the claim that is being made against you in this lawsuit, you should immediately contact your insurance representative. Other action you may have to take is described in the Connecticut Practice Book which may be found in a superior court law library or on-line at www.jud.ct.gov under "Court Rules."
- If you have questions about the Summons and Complaint, you should talk to an attorney quickly. **The Clerk of Court is not allowed to give advice on legal questions.**

Signed (Sign and "X" proper box) 	<input checked="" type="checkbox"/> Commissioner of the Superior Court <input type="checkbox"/> Assistant Clerk	Name of Person Signing at Left Gary W. Hawes	Date signed 01/21/2014
If this Summons is signed by a Clerk: a. The signing has been done so that the Plaintiff(s) will not be denied access to the courts. b. It is the responsibility of the Plaintiff(s) to see that service is made in the manner provided by law. c. The Clerk is not permitted to give any legal advice in connection with any lawsuit. d. The Clerk signing this Summons at the request of the Plaintiff(s) is not responsible in any way for any errors or omissions in the Summons, any allegations contained in the Complaint, or the service of the Summons or Complaint.			For Court Use Only File Date
I certify I have read and understand the above:	Signed (Self-Represented Plaintiff)	Date	
Name and address of person recognized to prosecute in the amount of \$250			Docket Number
Signed (Official taking recognizance; "X" proper box)	<input type="checkbox"/> Commissioner of the Superior Court <input type="checkbox"/> Assistant Clerk	Date	

RETURN DATE: FEBRUARY 18, 2014

GEORGE JEPSEN, ATTORNEY GENERAL <i>Plaintiff</i>	:	SUPERIOR COURT
	:	JUDICIAL DISTRICT OF HARTFORD
v.	:	
DOC HURLEY SCHOLARSHIP FOUNDATION, INC. <i>Defendant</i>	:	JANUARY 21, 2014

COMPLAINT

1. This action is brought by George Jepsen, the Attorney General of the State of Connecticut (the “Attorney General”), pursuant to Conn. Gen. Stat. §§ 33-1038 and 33-1187(a)(4) to stop the wasting of charitable funds and to dissolve a corporation that has forfeited its charitable corporate status. The Doc Hurley Scholarship Foundation, Inc. (the “Foundation”) has perpetuated a consistent course of conduct that (1) is inconsistent with the requirements of charitable corporations in the State of Connecticut, (2) is destructive to its charitable purpose to recognize, motivate, and reward outstanding students with financial need to pursue higher education, (3) is in conflict with and does injury to the public’s interest in charitable organizations and charitable gifts, and (4) violates the Statute of Charitable Trusts, Conn. Gen. Stat. § 45a-514, and the Statute of Charitable Uses, Conn. Gen. Stat. § 47-2. This lawsuit seeks to dissolve the Foundation through its requests for appropriate injunctive relief.

COUNT ONE (Quo Warranto)

2. The plaintiff is George Jepsen, Attorney General of the State of Connecticut, who is authorized by Conn. Gen. Stat. § 33-1187(a)(4) to institute proceedings in the nature of *quo warranto* to dissolve a Connecticut nonstock corporation.

3. At all times relevant herein, the defendant, Doc Hurley Scholarship Foundation, Inc., is a Connecticut nonstock corporation, incorporated in 1989 pursuant to the Nonstock Corporation Act, Conn. Gen. Stat. §§ 33-1000 et seq. The Foundation currently maintains an office in Hartford, Connecticut.

4. The Foundation applied for and was granted § 501(c)(3) tax-exempt status by the Internal Revenue Service on or about October 3, 1989. Additionally, the Foundation registered with the Department of Consumer Protection pursuant to the Solicitation of Charitable Funds Act, Conn. Gen. Stat. § 21a-175 et seq.

5. The Foundation's charitable purpose, as set forth in its Certificate of Incorporation is

to [provide] scholarships for study in schools of higher education beyond the high school level to persons who are graduating Hartford area high school students, to graduating students attending high schools participating in the Annual Doc Hurley Basketball Classic, and to students that have received a Doc Hurley Scholarship and are attending an undergraduate college.

At all times relevant herein and consistent with the Foundation's stated purpose, the Foundation ran a scholarship program for Hartford area, college bound students. (**Exhibit 1, Affidavit of Patrice Wood, ¶¶ 4, 5, 7; and Exhibit 2, Affidavit of John C. Norman, Ph.D, ¶¶ 3, 6.**)

6. On or about 1999, the Foundation began a Legacy Campaign to generate charitable donations to the Foundation to support its scholarship program. **(Exhibit 1, Wood Affidavit, ¶¶ 4, 5; Exhibit 2, Norman Affidavit, ¶ 6; Exhibit 3, Affidavit of John Neumon, ¶¶ 15, 16.)** The Legacy Campaign generated approximately 2.5 million for the Foundation over several years. **(Exhibit 3, Neumon Affidavit, ¶ 16.)** The charitable funds created by this campaign (the “Legacy Fund”) were intended for scholarship use and the Foundation’s operational costs. And only the interest generated by the Legacy Fund was to be used for these charitable purposes, i.e., it was an endowment fund. **(Exhibit 1, Wood Affidavit, ¶ 5; Exhibit 3, Neumon Affidavit, ¶ 16.)**

7. Although the Legacy Fund was given with the intent to preserve the corpus and only use the interest therefrom for the Foundation’s scholarships and operational costs, the Foundation failed to protect those charitable assets. In fact, the amount remaining in the Legacy Fund had dwindled to just over \$1 million by the beginning of January 2007. **(Exhibit 4, Affidavit of Michele Paige, ¶ 10.)**

8. At about that same time and soon thereafter, the Foundation began defaulting on its required corporate filings.

9. The Foundation failed to file its annual report with the Connecticut Secretary of the State from 2008 to the present, as required by Conn. Gen. Stat. § 33-1243(a). **(Exhibit 5, Affidavit of Cheryl Turner, ¶¶ 4, 6, 7.)**

10. The Foundation failed to maintain its charitable registration with the Connecticut Department of Consumer Protection (“DCP”), pursuant to the Solicitation of Charitable Funds

Act (the "Solicitation Act"), Conn. Gen. Stat. § 21a-175 et seq., which resulted in the expiration of its registration on May 31, 2007. This DCP registration is necessary for a charity to solicit charitable donations. **(Exhibit 5, Turner Affidavit, ¶¶ 4, 8.)**

11. The Foundation failed to file its IRS Form 990 with the Internal Revenue Service for fiscal years ending December 2008 to the present, which resulted in the Foundation's losing its § 501(c)(3) tax-exempt status on May 15, 2011. **(Exhibit 5, Turner Affidavit, ¶¶ 4, 5.)**

12. The corporate filing defaults and the lack of protections for the charitable donations in the Legacy Fund are a direct result of the Foundation's utter lack of corporate procedures, form, or internal control mechanisms.

13. During the relevant time period, the Foundation did not have a functioning board of trustees who were given reports on the financial health of the Foundation or who had any oversight of or control over the financial transactions of the Foundation. Additionally, during the relevant time period, all power and control over the Foundation's assets resided only with the Executive Director. **(Exhibit 1, Wood Affidavit, ¶¶ 3, 8, 9; Exhibit 2, Norman Affidavit, ¶¶ 4, 7).**

14. Even when the board of trustees did meet, minutes of the meetings were not regularly taken, and new trustees were simply added to the board instead of being elected and voted in, as set forth in the Foundation's Bylaws. **(Exhibit 1, Wood Affidavit, ¶¶ 2, 3; Exhibit 2, Norman Affidavit, ¶ 5.)**

15. The corporate dysfunction of the Foundation was so pervasive that by June of 2011, the Foundation had expended all of its assets, including every penny of the Legacy Fund.

(Exhibit 4, Paige Affidavit, ¶ 10). Most importantly, though, the Foundation's dysfunction caused it to default on the payment of scholarships that it had already awarded.

16. Even as late as the Fall of 2013, the Foundation was soliciting charitable funds, courting new applicants for its scholarship program, and representing that it was a § 501(c)(3) tax-exempt charity on its website, all while its financial accounts were depleted, it was not registered with DCP, and it had lost its § 501(c)(3) tax-exempt status. **(Exhibit 3, Neumon Affidavit, ¶¶ 14, 18, 19; Exhibit 4, Paige Affidavit, ¶ 10; Exhibit 5, Turner Affidavit, ¶ 4.)**

17. The Foundation has abused and misused its corporate status in that it has engaged in activities and conduct that are in derogation of and inconsistent with its charitable purpose; namely, it abandoned its obligation to protect the Legacy Fund for the benefit of the intended beneficiaries of those charitable gifts, in violation of the Statute of Charitable Uses, Conn. Gen. Stat. § 42-7 and the Statute of Charitable Trusts, Conn. Gen. Stat. §45a-514, and it failed to honor numerous scholarship pledges it made to Doc Hurley scholarship recipients.

18. The Foundation has further abused and misused its corporate status and acted contrary to the public interest in that it held itself out to the public as a corporation but never operated as one and also in that it violated numerous provisions of the Solicitation Act, including but not limited to, § 21-190b, which prohibits soliciting charitable contributions without registering with DCP.

19. The Foundation's conduct and activities, as set forth in Count One, show a clear forfeit of its corporate status and merit the judicial dissolution of the Foundation, pursuant to Conn. Gen. Stat. § 33-1187 *et seq.*

COUNT TWO (Ultra Vires Acts)

1-18. Paragraphs 1 through 18 of Count One are hereby incorporated as paragraphs 1 through 18 of Count Two as if more fully set forth herein.

19. The course of conduct of the Foundation, as set forth herein, is unauthorized in that it is in derogation of and inconsistent with its Certificate of Incorporation, is contrary to the public interest and the law regarding charitable assets, and is in violation of state statutes.

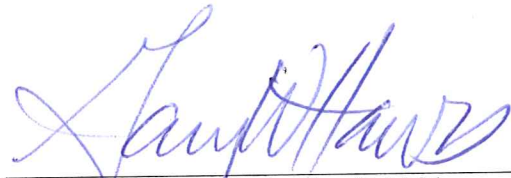
20. The Foundation's conduct and activities, as set forth in Count Two, merit the entry of injunctive relief against the Foundation, pursuant to Conn. Gen. Stat. § 33-1038(b)(3).

DEMAND FOR RELIEF

WHEREFORE, the Attorney General prays for the following relief:

1. An order dissolving the corporate status of the Doc Hurley Scholarship Foundation, Inc., pursuant to Conn. Gen. Stat. § 33-1187(a)(4).
2. An order enjoining the Doc Hurley Scholarship Foundation, Inc., from any and all acts until so further ordered by the Court.
3. Such other relief as the Court deems necessary.

BY:



Gary W. Hawes, Juris No. 415091
Assistant Attorney General
55 Elm Street, P.O. Box 120
Hartford, Connecticut 06141-0120
Tel: (860) 808-5020
Fax: (860) 808-5347
Email: gary.hawes@ct.gov

Exhibit 1

GEORGE JEPSEN
ATTORNEY GENERAL
Plaintiff

v.

DOC HURLEY SCHOLARSHIP
FOUNDATION, INC.
Defendant

: SUPERIOR COURT
:
: JUDICIAL DISTRICT OF HARTFORD
:
:
:
:
:
: JANUARY 21, 2014

AFFIDAVIT OF PATRICE WOOD

STATE OF CONNECTICUT:

:
COUNTY OF HARTFORD : ss. Hartford

I, Patrice Wood, being duly sworn, depose and say:

1. I am over the age of eighteen (18) and understand the obligation of an oath.
2. On or about 1998, I became a board member of the Doc Hurley Scholarship Foundation, Inc. (the "Foundation") and served on the board of trustees (the "Board") until sometime in 2006. My board membership was not put to a vote of the board; rather, a previous board member said it would be a good opportunity for me, and I was welcomed aboard.
3. When I first started as a member of the board, it met on average about every three months. The focus of the meetings was always on the scholarship program that was run by the Foundation. The Board did not discuss or review any specifics relating to the financial status of the Foundation. It did not receive any reports relating to the finances of the Foundation. No corporate minutes were taken at the meetings, and it did not review any of the required filings of the Foundation.

4. In the early 2000's, as a board member, I became aware of the campaign by some of the other board members and other members of the Hartford community to raise a substantial amount of charitable donations to secure the financial health of the Foundation and its scholarship program going forward. The monies raised as a part of this campaign were referred to by members of the board as the Legacy Fund.

5. The Legacy Fund was intended to be a perpetual endowment fund, i.e., that interest only was to be used by the Foundation, and the use to which these funds were to be put was the annual scholarships given by the Foundation, the annual salary of an Executive Director (no more than \$50,000), and the operating costs of running the Foundation.

6. I recall that the Legacy Fund raised over \$1,000,000.

7. In the early to mid-2000's, I became the Treasurer of the Foundation and served as Treasurer through 2006. Initially, as Treasurer, I maintained the Foundation's checkbook for its operating account. I held this bookkeeper role for less than a year. I quickly relinquished that role and served the remainder of my time as Treasurer in name only. My only responsibility (as a board member, not as the Treasurer) was to help with the selection process with the scholarship program run by the Foundation.


8. As Treasurer, I never received copies of any of the Foundations' financial reports, nor did I review or approve of any of the Foundation's corporate filings.

9. From the early 2000's until I left the Board in 2006, board meetings became less frequent. And even when we did have them, the Board did not regularly discuss or review any specifics relating to the financial status of the Foundation. The Board did not regularly receive

any financial reports of the Foundation. Corporate minutes were not regularly taken at the meetings, and the Board did not review any of the required filings of the Foundation.

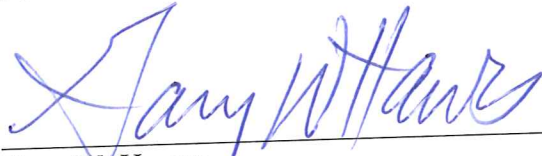
10. Since I left the Board in 2006, I have not served the Foundation in any respect and have no knowledge of its workings.

11. Since I left the Board in 2006, I learned that my name continued to be listed on the Foundation's website as the Foundation's Treasurer. When I discovered this, I contacted the Foundation and asked that my name be removed. It was many, many months, if not years, until my name was removed as Treasurer of the Foundation.



Patrice Wood, Former Treasurer and Board Trustee
of the Doc Hurley Scholarship Foundation, Inc.

Subscribed and sworn to before me this 21st day of January, 2014.



Gary W. Hawes
Assistant Attorney General

Exhibit 2

RETURN DATE:

GEORGE JEPSEN
ATTORNEY GENERAL
Plaintiff

v.

DOC HURLEY SCHOLARSHIP
FOUNDATION, INC.
Defendant

: SUPERIOR COURT
:
: JUDICIAL DISTRICT OF HARTFORD
:
:
:
:
:
: JANUARY 21, 2014

AFFIDAVIT OF JOHN C. NORMAN, Ph.D.

STATE OF CONNECTICUT:

: ss.

COUNTY OF HARTFORD :

I, John C. Norman, being duly sworn, depose and say:


1. I am over the age of eighteen (18) and understand the obligation of an oath.
2. On or about 2003, I became chairman of Board for the Doc Hurley Scholarship Foundation, Inc. (the "Foundation") and served in that role until on or about in 2005.
3. The focus of Board activity when I came onto the Board was always on the scholarship program that was administered by the Foundation. The Board reviewed information from scholarship candidates and selected college-bound greater Hartford area students to receive Doc Hurley scholarships. The Board selected recipients for two types of scholarships awarded by the Board: (1) Book Scholarships to assist recipients with the cost of academic books and related expenses, and (2) Legacy Scholarships for tuition assistance.

4. Muriel Hurley-Carter was employed by the Foundation as executive director and managed all fiscal and administrative activities for the Foundation during my tenure on the Board.

5. There were no minutes kept of Board meetings. Muriel Hurley-Carter was responsible for all documentation of Board meetings that was required by law and good fiduciary practice.

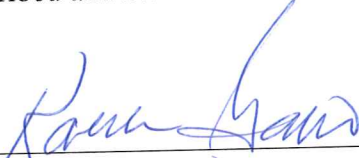
6. It was and is my understanding that there was a Legacy Fund which had been established by fundraising efforts prior to my service on the Board that was intended for scholarships and for the Foundation's operational costs.

7. During my tenure as Board chairman, the Board did not receive any reports relating to the finances of the Foundation and was not expected to discuss or review any specifics relating to the financial status of the Foundation.



Dr. John C. Norman, Former Chairman
of the Doc Hurley Scholarship Foundation, Inc.

Subscribed and sworn to before me this 20thth day of January, 2014.



Karen Gano
Assistant Attorney General
Commissioner of the Court

Exhibit 3

RETURN DATE:

GEORGE JEPSEN
ATTORNEY GENERAL
Plaintiff

v.

DOC HURLEY SCHOLARSHIP
FOUNDATION, INC.
Defendant

: SUPERIOR COURT
:
: JUDICIAL DISTRICT OF HARTFORD
:
:
:
:
:
: JANUARY 21, 2014

AFFIDAVIT OF JOHN NEUMON

STATE OF CONNECTICUT:

: ss. Hartford

COUNTY OF HARTFORD :

I, John Neumon, being duly sworn, depose and say:

1. I am over the age of eighteen (18) and understand the obligation of an oath.
2. Since September 2012, I have been employed by the Connecticut Department of Consumer Protection (“DCP”) as the Director of the Frauds Division. My primary responsibilities include coordinating, planning and managing all division activities.
3. The Frauds Division is comprised of several units, including the Charities and Financial Investigations Unit and the Investigations Unit. These units investigate alleged violations under several statutory areas, including the Connecticut Unfair Trade Practices Act, the Home Improvement Act, and the Solicitation of Charitable Funds Act.
4. Prior to my employment with DCP, I have been employed by several agencies in various investigative roles, including Lead Legal Investigator at the State Elections Enforcement

Commission, Legal Investigator at the Office of the Attorney General, and both Lead Social Services Investigator and Social Services Investigator at the Department of Social Services.


5. I have received training in numerous and various aspect of investigations including, but not limited to, interviewing techniques, financial investigations, and methods of documenting and capturing information on the internet. My education includes graduate level accounting. I am a Certified Fraud Examiner as well as a licensed attorney admitted in Connecticut.
6. As a part of my job responsibilities at DCP and in connection with DCP's investigation of the Doc Hurley Scholarship Foundation, Inc. (the "Foundation"), I interviewed or was present at interviews with Muriel Hurley-Carter, the Executive Director of the Foundation. Ms. Hurley-Carter's initial interview was informal, but additional interviews were in response to an administrative subpoena served on the Foundation. [Exhibit A, Foundation Subpoena.]
7. Among other things, Ms. Hurley-Carter stated that the Foundation awarded scholarships. These scholarships generally took one of two forms. One form of scholarship was called a "book scholarship" that is a one-time grant typically in the amount of \$250.00 or \$500.00 that was routinely paid directly to the bookstore of the educational institution of the recipient. The other form of scholarship was a "Doc Hurley legacy scholarship" that is an annually renewable grant of \$2,500.00.

8. Ms. Hurley-Carter stated that the Foundation was behind on scholarships and that she would work to “make it right”.
9. Ms. Hurley-Carter also informed me that the Foundation had advertised and run its annual Doc Hurley Classic Basketball Tournament (the “Tournament”) in December of 2011 and 2012. In fact, she stated that it had been run continuously for 38 years.
10. Ms. Hurley-Carter indicated that the Tournament each year was “a wash” due to the high expenses for security, insurance, and other costs related to the venue and running the events.
11. In the routine course of the investigation, I periodically reviewed various web pages of the Foundation’s website located at www.docscholar.org.
12. One of the pages I viewed on December 13, 2013 displayed the 2013 Tournament schedule. [Exhibit B, 2013 Tournament schedule.]
13. On the page providing the 2013 Tournament schedule, the general public was allowed to order tickets via e-mail to muriel@docscholar.org, which is the e-mail address at which I corresponded with Ms. Hurley-Carter.
14. One of the pages I viewed on December 13, 2013 displayed information relating to the “Doc Hurley Scholarship Application”. Applications were to be available “...no later than the second week of January 2014.” [Exhibit C, 2014 Scholarship information.]
15. One of the pages I viewed on January 17, 2014 displayed information relating to the “Doc Hurley Legacy Campaign”. The page reads that “The establishment of this

program will ensure that Doc's legacy of commitment to youth, education and community continues into the future." [Exhibit D, Legacy Campaign.]

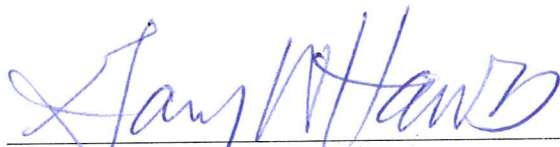
16. Further, the Legacy Campaign reads that, "an endowment was established with a goal of 3 million dollars. To date the legacy campaign has generated approximately 2.5 million in donations and pledges." [Exhibit D, Legacy Campaign.]
17. One of the pages I viewed on November 6, 2013 was the home page of the Foundation located at docscholar.org. [Exhibit E, Foundation November Home page.]
18. The home page on that date read that "Gifts may be payable to: Doc Hurley Scholarship Foundation, Inc. 103 Woodland Street, Hartford, CT 06105." [Exhibit E, Foundation November Home page.]
19. Further the home page on that date read that "The Doc Hurley Scholarship Foundation, Inc. is a registered 501 (c) 3. Tax ID # 22-2997358." [Exhibit E, Foundation November Home page.]
20. On November 6, 2013 I personally handed Ms. Hurley-Carter a letter signed by the Commissioner of Consumer Protection stating that the Foundation must immediately cease and desist from all fundraising activities and making any misrepresentations, such as the fact that the Foundation may be a "a registered 501 (c) 3". [Exhibit F, Cease and Desist Letter.]
21. On November 6, 2013 Ms. Hurley-Carter stated to me at that time that she would have the statement regarding the 501 (c) (3) status removed from the website until such time as the Foundation regained that status.

22. The most recent version of the Foundation's home page does not represent that the Foundation is a 501 (c) (3) organization, but rather reads to discuss the mission of the Foundation and the scholarship program. [Exhibit G, Foundation January Home page.]
23. On January 21, 2014 in response to my inquiry about the underlying registrant of www.doescholar.org, I received an e-mail from "DomainsByProxy", which is a proxy registration company. In that e-mail DomainsByProxy indicated that the underlying registrant is listed as Muriel Hurley-Carter, Doc Hurley Scholarship Foundation, Inc. [Exhibit H, Webpage registration.]



John Neumon, Director, Frauds Division
Department of Consumer Protection

Subscribed and sworn to before me this 21st day of January, 2014.



Gary W. Hawes
Assistant Attorney General

EXHIBIT A

STATE OF CONNECTICUT
BEFORE THE COMMISSIONER OF CONSUMER
PROTECTION

SUBPOENA DUCES TECUM

Doc Hurley Scholarship Foundation
103 Woodland Street
Hartford, Connecticut 06105

BY THE AUTHORITY OF THE STATE OF CONNECTICUT, and more particularly by the authority granted to the Commissioner of Consumer Protection for the State of Connecticut by virtue of Section 21a-190i(b) of the Connecticut General Statutes, the Doc Hurley Scholarship Foundation is hereby commanded to appear before the Commissioner of Consumer Protection, or his designee, for a deposition upon oral examination at the Department of Consumer Protection, 165 Capitol Avenue, Room 119, Connecticut, 06106, on November 15, at 10:00 a.m., or on such other date and time as may be continued thereafter, and to bring with you the documentary materials listed on Schedule A, which are in your possession, custody or control, with regard certain matters under investigation by the Department of Consumer Protection and the Office of the Attorney General.

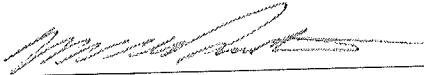
The matters under investigation include, but are not limited to, whether the Doc Hurley Scholarship Foundation, its directors, officers, employees, and/or agents (1) engaged in any financial transactions that were not related to the accomplishment of its charitable purpose or that jeopardized its ability to accomplish its charitable purpose, or appropriated any property of a charitable organization for a private use, or (2) conducted a charitable solicitation campaign without being registered with the Department of Consumer Protection.

Should you be able to provide the documents electronically, please present them in Microsoft Word, Excel, or pdf format. Financial documents should be provided in Excel or QBW format if possible.

IF YOU FAIL TO OBEY THE TERMS OF THIS SUBPOENA, APPROPRIATE RELIEF WILL BE SOUGHT IN ACCORDANCE WITH SECTION 21a-190i(c) OF THE CONNECTICUT GENERAL STATUTES. HEREOF FAIL NOT UNDER PENALTY OF LAW.

To any proper officer or indifferent person to serve and return.

Dated at Hartford, Connecticut, this 6 day of November, 2013.



William M. Rubenstein
Commissioner of Consumer Protection

SCHEDULE A

1. Bank statements and canceled checks for all checking accounts open in the name of the Doc Hurley Scholarship Foundation (the "Foundation"), including all documents and/or correspondence as to whom debit cards may have been issued for each account, from January 1, 2007, to the present.
2. Any and all savings passbooks, investment account statements, or statements of savings open in the name of the Foundation, including all documents and/or correspondence as to whom debit cards may have been issued for each savings account, from January 1, 2007, to present.
3. Check registers, cash disbursement journals or any other listings of checks paid out of accounts, showing, for each account: (a) date paid; (b) check number; (c) check payee; and (d) reason for the disbursement from January 1, 2007, to present.
4. Check registers, cash receipts journals or any other listings of deposits made to accounts, showing, for each account: (a) date received; (b) payer; and (c) reason for receipt from January 1, 2007, to present.
5. Any other journals maintained by the Foundation as part of its accounting system, including, but not limited to, general journals, purchases journals, sales journals, or special journals from January 1, 2007, to present.
6. Final adjusted general ledgers for the fiscal year ended December 31, 2007, through December 31, 2012.
7. A chart of accounts, including account numbers for all of the Foundation's financial accounts.
8. Paid invoice file(s) containing documentary evidence for checks paid, for cash paid, and/or for reimbursements of others from January 1, 2007, to present.
9. Any and all accounting work sheets, spread sheets, financial statements, tax returns and information returns prepared from January 1, 2007, to present, including but not limited to IRS Forms W3, W2, 1099 and 990.
10. For any loan receivable by the Foundation or any loan payable by the Foundation or any employee advances made by the Foundation, from January 1, 2007, to the present, copies of the note documents, copies of any

board of directors approval or discussion of the loans, and a list showing the name and address of the lender/borrowers, original amount of the loan, balance due on the loan, maturity date of the loan, repayment terms, interest rate, security provided for the loan, and the purpose of the loan.

11. Any and all documents pertaining to credit cards opened in the name of the Organization or in the name of any employee or trustee on behalf of the Organization.

12. Any and all payroll records of full time and part time employees from January 1, 2001, to the present.

13. A copy of the Foundation's charter, its by-laws, and its corporate minutes from January 1, 2001, to the present.

14. A copy of the Foundation's form 1023 application to the Internal Revenue Service, the Foundation's tax-exemption approval letter from the IRS, and any other communications to or from the IRS or Connecticut Department of Revenue Services, including but not limited to any notice of revocation of tax exemption or any application for reinstatement of tax exempt status.

15. A list of all officers, directors, employees, and trustees of the Organization from January 1, 2001, to present, including all known addresses, phone numbers, and email addresses for each individual listed.

16. Copies of all materials provided to the public that announced or advertised the Doc Hurley Scholarship Basketball Classic, including but not limited to, all advertisements, flyers, and/or posters, from January 1, 2007, to the present.

17. Copies of all correspondence in your possession relating to any campaign to solicit charitable funds for the Foundation, including the Doc Hurley Scholarship Basketball Classic, from January 1, 2007, to the present.

18. Copies of all documents relating to the selection of recipients of the Foundation's scholarships and copies all documents relating to the disbursement of charitable funds on the recipients' behalf, from January 1, 2007, to the present.


19. Print outs of all of the Foundation's webpages, from January 1, 2007, to the present.

VERIFICATION AND RETURN OF SERVICE

I do hereby certify that on Wednesday, November 6 at 3:00 A.M./P.M.
that I, John Neuman, served a true and attested copy of the
foregoing subpoena upon Muriel Hurley-Carter of at 165 Capitol Avenue, Room 117,
Hartford, CT 06106.
by the following method:

- In hand service
- Abode located at _____ and verified by _____.

Attest this 6th day of November, 2013 at Hartford, CT.



Name: John Neuman
Title: Director, Funds Division

EXHIBIT B

TOURNAMENT SCHEDULE

THURSDAY DECEMBER 19th, 2013
 4:45 p.m. - Northwest Catholic (girls) vs. Glastonbury (girls)
 6:30 p.m. - Weaver (girls) vs. New London (girls)
 8:00 p.m. - Capital Prep (girls) vs. Northampton (girls)

FRIDAY DECEMBER 20th, 2013
 4:45 p.m. - Conard vs. A.I. Prince Tech
 6:30 p.m. - Northwest Catholic vs. Bulkeley
 8:00 p.m. - University vs. Classical Magnet

SATURDAY DECEMBER 21st, 2013
 1:00 p.m. - Putnam Science Academy vs. CNC Leadership Prep
 3:00 p.m. - Glastonbury vs. Windsor
 5:00 p.m. - Bloomfield vs. Ledyard
 6:30 p.m. - Weaver vs. Capital Prep
 8:15 p.m. - Wilbur Cross vs. East Hartford

\$5 PER TICKET *PER DAY*
 (THURSDAY & FRIDAY)
\$10 FOR THE DAY (SAT)
 CALL FOR GROUP RATES
 CONTACT INFO: TEL. 860-819-9750
 OR 860-883-8491
 E-MAIL: MURIEL@DOCSCHOLAR.ORG
 WWW.DOCSCHOLAR.ORG

THURSDAY DECEMBER 19
DJ CHANSE

FRIDAY DECEMBER 20
DJ CRAIG G

SATURDAY DECEMBER 21
DJ BIG PAPER

BROADCASTING LIVE

Join us to see some of the best Basketball Players and Teams under on roof in Hartford. See you at "THE DOC"

PROCEEDS FROM THIS EVENT ARE USED TO AWARD SCHOLARSHIPS TO DESERVING HIGH SCHOOL SENIORS FROM THE GREATER HARTFORD AREA

WEAVER HIGH SCHOOL
 DOC HURLEY FIELD HOUSE
 415 GRANBY STREET HARTFORD CONNECTICUT

Weaver High School's Doc Hurley Field House
415 Granby Street
Hartford, CT

To order tickets E-mail myrict@docscholar.org or call (860) 819-9750

From CDs & Posters and a great high school basketball showcase not to be missed.

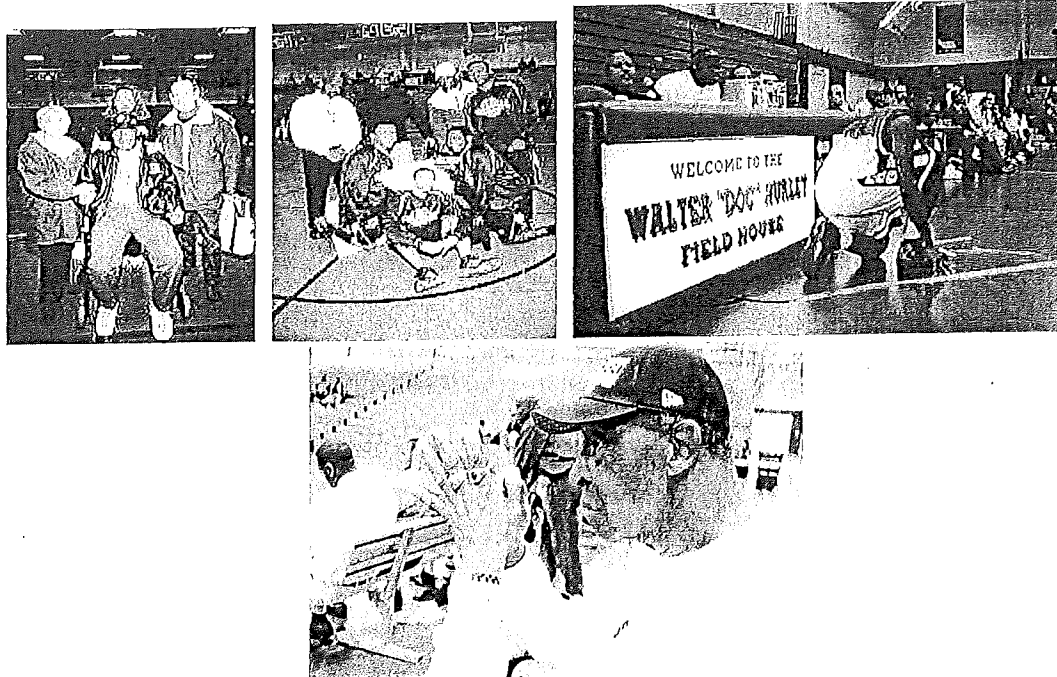





Hartford Snack Company
 Beauty Enterprises, Inc.

TAKING A LOOK BACK

Neumon affidavit
 Exhibit B: 2013 Tournament schedule
 Page 1 of 3



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[Doc Hurley Scholar](#)
[Board of Students](#)

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EXHIBIT C

Doc Hurley Scholarship



Doc Hurley Scholarship Application Information

Applications will be in the guidance offices of the following eligible high schools no later than the second week of January 2014. Only students from the eligible schools can apply. This is NOT an athletic scholarship.

ELIGIBLE SCHOOLS: A.J. Prince Technical, Avon High School, Bloomfield High School, Bristol Central High School, Bristol Eastern High School, Bulkeley High School, Capital Prep, Magnet School, Cheney Technical, Classic Magnet School, Conard High School, East Catholic High School, East Hartford High School, Farmington High School, Glastonbury High School, Hall High School, Hartford Public High School, Hillhouse High School, Kingwood-Oxford High School, Manchester High School, Merimapolis Preparatory School, Middletown High School, New Britain High School, New London High School, Newington High School, Northwest Catholic High School, Norwich Free Academy, Rockville High School, Rocky Hill High School, Simsbury High School, South Windsor High School, Sports Sciences Academy, St. Paul Catholic High School, Suffield High School, The Master's School, Watkinson School, Weaver High School, Weathersfield High School and Windsor High School.

Selection Criteria:

- * Graduating senior from eligible Greater Hartford area high school and beyond
- * Financial need
- * Academic excellence
- * Community Service
- * Essay written by applicant

Amount Awarded:

\$2,000 - \$10,000

Number of Awards:

varies

Deadline:

Postmarked by third Friday of March

How to apply:

Obtain Doc Hurley application materials from guidance office, we do not accept common applications. Applications will not be mailed to students.

Valid applications must include:

- Student Aid Report (SAR) from FAFSA showing Estimated Family Contribution (EFC)
- Three letters of recommendation
- Typed Essay (no more than 1 1/2 pages)
- High school transcript
- SAT or ACT scores

Neumon Affidavit
Exhibit C: 2014 Scholarship information
Page 1 of 2

The Doc Hurley Scholarship Foundation, Inc. considers and selects scholarship recipients based on the judgment of the Scholarship Committee as to financial need and academic/personal merit. Selections are made on a non-discriminatory basis, without regard to race, color, religious creed, gender, national origin, ancestry, or sexual orientation.

For more information on the 2014 application process, call (660) 815-0730 or e-mail info@docsholar.org



DOC HURLEY
SCHOLARSHIP FOUNDATION, INC.
...centered on education

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Home	About Doc Hurley	Kennedy Campaign	Doc Hurley Soccer	Find us
Sponsors	DHS Application	Basketball Classic	Board of Trustees	Links

EXHIBIT D

Doc Hurley Legacy Campaign



The Legacy Campaign

Doc was 77 in 1999 when he said to the Board of Trustees of the Doc Hurley Scholarship Foundation, "You know I'm going to want to retire in a few years. What's going to happen to all these young people?" The establishment of this program will ensure that Doc's legacy of commitment to youth, education and community continues far into the future. With the help of The Phoenix Companies, Inc. an endowment was established with a goal of 3 million dollars. To date the legacy campaign has generated approximately 2.5 million in donations and pledges.

Beginning in June of 2001, two Doc Hurley Legacy Scholars were awarded four-year scholarships of \$2,500 each and this year 2 more students were added to the Doc Hurley Legacy program. Ultimately, the Foundation envisions having a minimum of fifteen Doc Hurley Scholars each year.

[Back](#)

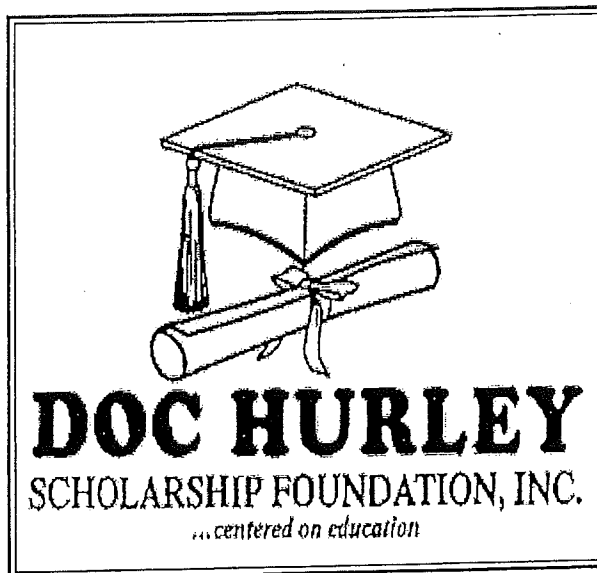


[Next](#)

DOC HURLEY
SCHOLARSHIP FOUNDATION, INC.
...centered on education

Home	About Doc Hurley	Legacy Campaign	Doc Hurley Scholar	Email us
Sponsors	DHSF Application	Basketball Classic	Board of Trustees	Links

EXHIBIT E



- About Doc Hurley*
- Legacy Campaign*
- The Doc Hurley Scholar*
- Board of Trustees*
- Sponsors*
- DHSF Application*
- The Basketball Classic*
- E-mail Us*
- Links*

Upcoming Events

37th Annual



**Scholarship Basketball Classic
December 15, 16 & 17, 2011**

The Doc Hurley Scholarship Foundation, Inc.

The **MISSION** of the Doc Hurley Scholarship Foundation is "to recognize, motivate and reward outstanding students with financial need to pursue higher education."

What is the Doc Hurley Scholarship Foundation?

The Doc Hurley Scholarship Foundation is a Hartford-based organization founded by Walter "Doc" Hurley, Sr. For 35 years Doc has been raising money for scholarships for Hartford area high school students who are about to enter college. For many years, Doc Hurley has been one-man fundraising machine, consumed by his desire to help as many kids as he could to on to a better life. In recent years he has been aided by a board of trustees and by his daughter, Muriel Hurley-Carter, who is now Executive Director of the organization and a driving force behind the furthering of her father's legacy.

What kind of financial support does the Doc Hurley Scholarship Foundation provide?

When Doc Hurley began these scholarships, he called them "book scholarships", because the size of the award was appropriate to cover the costs of the textbooks and supplies. In 1996 the amount of each award was raised from \$1,000 to \$2,000 each to recognize the increase

cost of books, computers and other necessary educational aids and supplies. In 2001, 14 students were awarded a \$2,000 book scholarship and 2 students were awarded \$2,500 renewable scholarships and this year we are proud to award 15 additional students with \$2,000 book scholarships and 1 more student received an award of a \$2,500 renewable scholarship.

How does the Scholarship Foundation currently raise most of its money?

The Scholarship Foundation currently raises most of its money through its major annual event, The Doc Hurley Basketball Classic, an invitational high school basketball tournament held in December. Although the Foundation also receives some other financial support from individuals and organizations throughout the year, its goal is to further build its year-round fundraising efforts.

Who is eligible for a Doc Hurley Scholarship? How are recipients selected?

Students are selected from a pool of applicants based on academic achievement, financial need, community service and an essay written by each candidate. All students in the high schools are welcome to apply and athletic performance is not a criterion, 94% of our recipients are not athletes. Applications are reviewed and approved by the Foundation's Scholarship Committee. Scholarship eligibility is open to students in most high schools in the Greater Hartford area.

How does a student apply for a Doc Hurley Foundation Scholarship?

Doc Hurley Scholarship applications are available in the guidance offices of our thirty-eight participating high schools no later than the second week of January 2009. We do not send individual applications.

What are some of the Scholarship Foundation's key statistics over the past 33 years?

Since the Foundation's inception, it has given more than \$500,000 in scholarships to 490 students.

Past recipients have attended the following colleges:

Bentley, Bethune Cookman, Boston College, Brown University, Bryant, Capitol Community, Cazenovia Central Connecticut, Clark University, UCONN, Dartmouth, Duke, Eastern Connecticut, Elms College, Emory, Fairfield, Fordham, Georgia State, Green Mountain College, Hampton, Hartford, Howard, John Hopkins, Lawrence University, Lynchberg, Maryland, Massachusetts, Morehouse, Morgan State, Mount IDA, University of New Hampshire, Norfolk State, Notre Dame, Pennsylvania, Providence, Sacred Heart, St. Joseph's College, Southern Connecticut, Spelman, Springfield College, Syracuse Tampa, Temple, Trinity, Tufts, Tuskegee, Virginia State, Wesleyan, Wheelock, Wingate, Worcester Tech. and more.

How May Gifts Be Made To The Foundation?

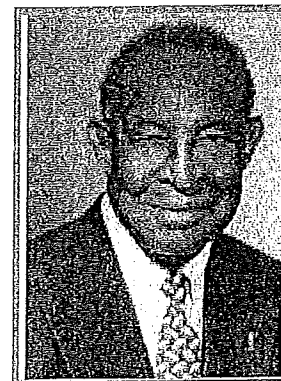


Gifts may be made payable to:

Doc Hurley Scholarship Foundation, Inc.
103 Woodland Street
Hartford, CT 06105

The Doc Hurley Scholarship Foundation, Inc. is a registered 501(c) 3. Tax ID# 22-2997358.

Tel.: 860-819-9750



<u>Home</u>	<u>About Doc Hurley</u>	<u>Legacy Campaign</u>	<u>Doc Hurley Scholar</u>	<u>Email us</u>
<u>Sponsors</u>	<u>DHSF Application</u>	<u>Basketball Classic</u>	<u>Board of Trustees</u>	<u>Links</u>

This site is maintained by the Doc Hurley Scholarship Foundation, Inc.

EXHIBIT F



STATE OF CONNECTICUT
DEPARTMENT OF CONSUMER PROTECTION

November 6, 2013

Ms. Muriel Carter-Hurley, Executive Director
Doc Hurley Scholarship Foundation, Inc.
103 Woodland Street
Hartford, CT 06105

Re: Solicitation of Charitable Funds Act

Dear Ms. Carter-Hurley:

It has come to my attention that the Doc Hurley Scholarship Foundation (the "Foundation") is not registered with the Department of Consumer Protection (the "Department") pursuant to the Connecticut Solicitation of Charitable Funds Act (the "Solicitation Act")¹. Since your organization is not registered with the Department, you must immediately cease and desist from all fundraising activities in the State of Connecticut, including any online requests for donations as found on the Foundation's website (www.docscholar.org). Continuing any charitable solicitations without proper registration violates the Solicitation Act. Violations of the Solicitation Act are subject to civil and/or criminal penalties under Connecticut law.

I have also been apprised of allegations of other violations of the Solicitation Act, including allegations that the Foundation continues to represent that it is "a registered 501(c) 3" despite the Internal Revenue Service having revoked such status. Any such misrepresentation, including those made on the Foundation's website, should cease and desist immediately.

We look forward to the Foundation coming into complete compliance with all of the requirements of the Solicitation Act and all applicable governing laws. General information on the requirements of a charity and the appropriate forms are available on the Department's web site at www.ct.gov/dcp/publiccharities. Should you have any questions regarding this letter or the requirements of coming into compliance, please contact Frauds Division Director John Neumon at john.neumon@ct.gov or Accounts Examiner Michele Paige at Michele.paige@ct.gov for guidance.

Sincerely,

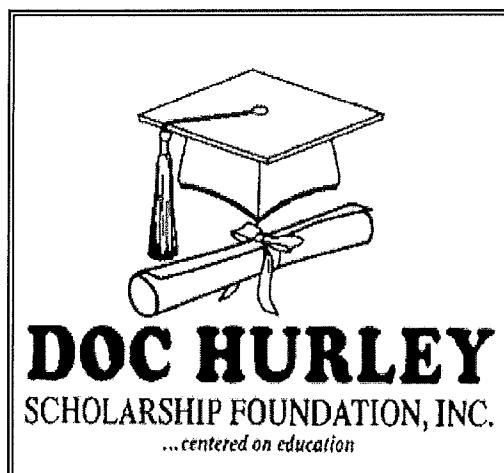
A handwritten signature in black ink, appearing to read 'William M. Rubenstein'.

William M. Rubenstein
COMMISSIONER

¹ Conn. Gen. Stat. § 21a-175 *et. seq.*

EXHIBIT G

[About Doc Hurley](#)
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The Doc Hurley Scholarship Foundation, Inc.

The **MISSION** of the Doc Hurley Scholarship Foundation is "to recognize, motivate and reward outstanding students with financial need to pursue higher education."

What is the Doc Hurley Scholarship Foundation?

The Doc Hurley Scholarship Foundation is a Hartford-based organization founded by Walter "Doc" Hurley. For 39 years Doc has been raising money for scholarships for Hartford area high school students who are about to enter college. For many years, Doc Hurley has been a one-man fundraising machine, consumed by his desire to help as many kids as he could to go on to a better life. In recent years he has been aided by a board of trustees and by his daughter, Muriel Hurley-Carter, who is now Executive Director of the organization and a driving force behind the furthering of her father's legacy.

What kind of financial support does the Doc Hurley Scholarship Foundation provide?

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What are some of the Scholarship Foundation's key statistics over the past 39 years?

Since the Foundation's inception, it has given more than \$500,000 in scholarships to 550 students.

Past recipients have attended the following colleges:

Bentley, Bethune Cookman, Boston College, Brown University, Bryant, Capitol Community, Cazenovia Central Connecticut, Clark University, UCONN, Dartmouth, Duke, Eastern Connecticut, Elms College, Emory, Fairfield, Fordham, Georgia State, Green Mountain College, Hampton, Hartford, Howard, John Hopkins, Lawrence University, Lynchberg, Maryland, Massachusetts, Morehouse, Morgan State, Mount IDA, University of New Hampshire, Norfolk State, Notre Dame, Pennsylvania, Providence, Sacred Heart, St. Joseph's College, Southern Connecticut, Spelman, Springfield College, Syracuse Tampa, Temple, Trinity, Tufts, Tuskegee, Virginia State, Wesleyan, Wheelock, Wingate, Worcester Tech. and more.



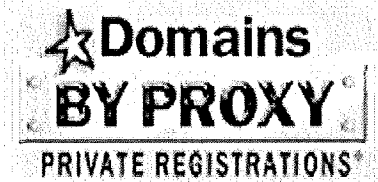
Home	About Doc Hurley	Legacy Campaign	Doc Hurley Scholar	Email us
Sponsors	DHSE Application	Basketball Classic	Board of Trustees	Links

This site is maintained by the Doc Hurley Scholarship Foundation, Inc.

EXHIBIT H

Neumon, John

From: registrantinquiries@domainsbyproxy.com
Sent: Tuesday, January 21, 2014 10:17 AM
To: Neumon, John
Subject: Update [Incident ID: 21748753] - In re: www.docscholar.org



Discussion Notes

Support Staff Response

Dear John Neumon,

Thank you for your inquiry. The non-public Registrant contact information for DOCSCHOLAR.ORG is set forth below. We have not notified the customer of your request.

Registrant Contact Information:

Muriel Hurley-Carter
Doc Hurley Scholarship Foundation, Inc.
103 Woodland Street
Hartford CT 06105
United States
PH:860-549-5012
Fax:860-549-5955
dochurscholar@aol.com

Please be advised that this information was provided by the customer. Therefore, we cannot guarantee its accuracy. If any of the information proves to be invalid, please let us know and we'll take steps to request updated information from the customer. Please contact us with any questions.

Customer Inquiry

```
/* Font Definitions */  
@font-face  
{font-family:Calibri;  
panose-1:2 15 5 2 2 2 4 3 2 4;}  
@font-face  
{font-family:"Tempus Sans ITC";  
panose-1:4 2 4 4 3 13 7 2 2 2;}  
@font-face
```

```
{font-family:"Viner Hand ITC";
panose-1:3 7 5 2 3 5 2 2 2 3;}
/* Style Definitions */
p.MsoNormal, li.MsoNormal, div.MsoNormal
{margin:0in;
margin-bottom:.0001pt;
font-size:11.0pt;
font-family:"Calibri","sans-serif";}
a:link, span.MsoHyperlink
{mso-style-priority:99;
color:blue;
text-decoration:underline;}
a:visited, span.MsoHyperlinkFollowed
{mso-style-priority:99;
color:purple;
text-decoration:underline;}
span.EmailStyle17
{mso-style-type:personal-compose;
font-family:"Calibri","sans-serif";
color:windowtext;}
.MsoChpDefault
{mso-style-type:export-only;
font-family:"Calibri","sans-serif";}
@page WordSection1
{size:8.5in 11.0in;
margin:1.0in 1.0in 1.0in 1.0in;}
div.WordSection1
{page:WordSection1;}
-->
```

I am seeking registrant information on the above listed website.

This request is made pursuant to my official duties and in the course of an investigation into allegation of misappropriation of charitable funds.

Sincerely,

John Neuman

=====

John Neumon

Department of Consumer Protection Frauds Division Director

165 Capitol Avenue Hartford, CT 06106

T: 860.713.6107 F: 860.706.5340

INFORMATION REGARDING DISCLOSURE: Transmission of, and responses to, this e-mail may be subject to disclosure under the Freedom of Information Act unless a specific exemption applies. The contents may be covered under attorney-client privilege or attorney work product privilege depending on the specifics of the relationship between the sender and recipient(s) or the specifics of the matter at hand. Recipients of this e-mail are advised to contact the signator above prior to transmitting any confidential materials. If the recipient or the reader of this e-mail is not the intended recipient, please notify us immediately by replying to the message so that we can rectify the mistake. After responding, please delete this e-mail and do not disseminate, distribute, or copy it.



If you need further assistance with this matter, please reply to this email and reference [Incident ID: 21748753].

Very truly yours,
Domains By Proxy Customer Support

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All rights reserved.
U.S. Pat No. 7,130,878



Exhibit 4

regulations, and state or federal requirements; preparing unit reports explaining results and making recommendations.

3. Prior to my employment with DCP, I worked as an auditor for the Auditors of Public Accounts, State of Connecticut.

4. I have a Bachelor of Science in Business Administration, a Master of Science in Accounting and Taxation, and a Master in Business Administration degree from the University of Hartford. I am a licensed Certified Public Accountant in the State of Connecticut.

5. As a part of my job responsibilities at DCP, I reviewed and analyzed various Webster Bank statements of the Doc Hurley Scholarship Foundation, Inc. (the "Foundation"), that DCP received from Muriel Hurley Carter, the Executive Director of the Foundation. The statements were provided by Ms. Hurley Carter to DCP in response to a subpoena served on the Foundation.

6. During the meeting that Ms. Hurley Carter provided the requested information she stated that the Foundation had only three financial accounts, all with Webster Bank.

7. Based upon the information contained in the Webster Bank statements, DCP subpoenaed all of the Foundation's financial records from Webster Bank from 2005 to the present. Ms. Hurley Carter, as Executive Director, consented to the release of the information in order to expedite the request. Webster Bank produced those records, and I have reviewed and analyzed all of these financial documents.

8. In addition to these documents, I have retrieved the Foundation's IRS Forms 990 from FoundationCenter.org for the time period of 2003 to 2007. The Foundation was a

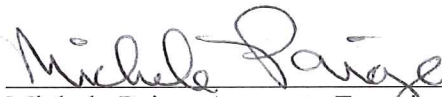
§501(c)(3) tax-exempt entity during this time period. All §501(c)(3) tax-exempt entities are required to file annually the IRS Form 990. I have reviewed these documents, too.

9. The documents show that on January 1, 2003, the Foundation had \$1,655,984 in net assets. This total was due in large part to the substantial contributions made to the Foundation in in the amount of \$809,607 in calendar year 1999 and in the amount of \$955,749 in calendar year 2000.

10. The Foundation's assets decreased over the next seven years and were completely depleted on June 2, 2011. The descent in assets followed this path:

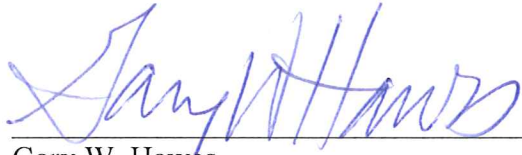
FYE 2002	\$1,655,984
FYE 2003	\$1,533,655
FYE 2004	\$1,378,780
FYE 2005	\$1,176,774
FYE 2006	\$1,142,747
FYE 2007	\$879,323
FYE 2008	\$470,499
FYE 2009	\$230,129
FYE 2010	\$52,970
June 2, 2011	\$0

11. Based upon the documents I reviewed, I believe that there are no assets remaining at the Foundation.



Michele Paige, Accounts Examiner
Department of Consumer Protection

Subscribed and sworn to before me this 21st day of January, 2014.



Gary W. Hawes
Assistant Attorney General

Exhibit 5

GEORGE JEPSEN	:	SUPERIOR COURT
ATTORNEY GENERAL	:	
<i>Plaintiff</i>	:	JUDICIAL DISTRICT OF HARTFORD
	:	
v.	:	
	:	
DOC HURLEY SCHOLARSHIP	:	
FOUNDATION, INC.	:	
<i>Defendant</i>	:	JANUARY 21, 2014

AFFIDAVIT OF CHERYL A. TURNER

STATE OF CONNECTICUT:
: ss. Hartford
COUNTY OF HARTFORD :

I, Cheryl A. Turner, being duly sworn, depose and say:

1. I am over the age of eighteen (18) and understand the obligation of an oath.
2. I am employed as a Paralegal Specialist II in the Connecticut Attorney General's Office, assisting with the investigation and enforcement of cases concerning public charities.
3. I have been assisting with the investigation of the corporate practices of the Doc Hurley Scholarship Foundation, Inc. (the "Foundation").
4. Early on in our investigation, on or around November, 2013, I researched the corporate, charitable registration, and tax-exempt status of the Foundation. I reviewed the tax-exempt status of the Foundation on the Internal Revenue Service website and found that the Foundation had lost its 501(c)(3) tax exempt status and was listed on the Automatic Revocation of Exemption List. I also reviewed the corporate filing status of the Foundation on the Connecticut Secretary of the State's website and found that the Foundation last filed an annual

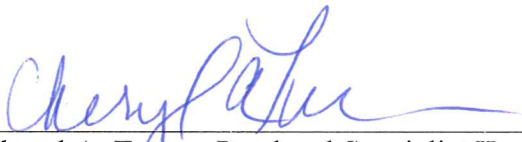
report in 2007. In addition, I reviewed the Department of Consumer Protection's website and found that the charitable solicitation registration status of the organization had expired in May of 2007.

5. On January 14, 2014, I again researched the website of the Internal Revenue Service, to review the tax-exempt status of the Foundation. The Foundation is listed on the "Automatic Revocation of Exemption List" as having lost its 501(c)(3) tax-exempt status on May 15, 2011, after failing to file its I.R.S. Form 990 for three consecutive years. A copy of the IRS website page showing the Foundation on the Automatic Revocation of Exemption List is attached as **Exhibit A**.

6. Also on January 14, 2014, I again researched the business filings of the Foundation on the Connecticut Secretary of the State's website. I found that the last annual report filed by the organization was filed on August 17, 2007. A copy of the filings history webpage for the Foundation is attached as **Exhibit B**.

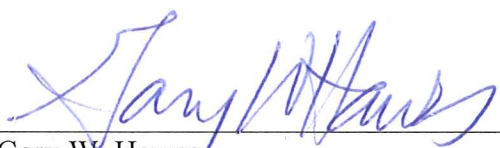
7. Also on January 14, 2014, I requested from the Commercial Recording Division of the Office of the Secretary of the State, via electronic mail, certified copies of the following documents, which were filed by the Foundation with the Connecticut Secretary of State: Incorporation document, Amendment, Org. Report, RNST/RPT 2001, and 2007 Annual report, in addition to any and all documents filed with the Secretary of State after the last filing (2007) as shown on the business filings (CONCORD) database. Certified copies of the requested corporate documents are attached as **Exhibit C**.

8. On January 14, 2014, I also again researched the Foundation's charities registration status with the Connecticut Department of Consumer Protection ("DCP") and learned that the Foundation had failed to maintain its charitable registration with DCP, pursuant to the Solicitation of Charitable Funds Act, Conn. Gen. Stat. § 21a-175 et seq., which resulted in the expiration of its registration on May 31, 2007. This DCP registration is necessary for a charity to solicit charitable donations. A copy of the DCP website, specifically the "verify a license" look up page indicating registration expiration is attached as **Exhibit D**.



Cheryl A. Turner, Paralegal Specialist II
Office of the Attorney General

Subscribed and sworn to before me this 21st day of January, 2014.



Gary W. Hawes
Assistant Attorney General

Exhibit A



Exempt Organizations Select Check

[Exempt Organizations Select Check Home](#)

Automatic Revocation of Exemption -- Search Results

The federal tax exemption of each organization listed below was automatically revoked for its failure to file a Form 990-series return or notice for three consecutive years. The revocation date listed below for each organization is *historical*; it reflects an organization's effective date of automatic revocation for not filing a Form 990-series return or notice for three consecutive years, but not necessarily its current tax-exempt or non-exempt status. The organization may have applied to the IRS for recognition of exemption and been recognized by the IRS as tax-exempt *after* its effective date of automatic revocation. Click on an organization's name to see more details on that organization. To check whether an organization is currently recognized by the IRS as tax-exempt, call Customer Account Services at (877) 829-5500 (toll-free number).

Results are sorted by EIN. To sort results by another category, click on the icon next to the column heading for that category. Clicking on that icon a second time will reverse the sort order. Click on a column heading for an explanation of information in that column.

1-1 of 1 results

Results Per Page 25

« Prev | 1-1 | Next »

<u>EIN</u> ▲	<u>Legal Name (Doing Business As)</u> ▲	<u>City</u> ▲	<u>State</u> ▲ <u>ZIP</u> ▲	<u>Country</u> ▲ <u>Exemption Type</u> ▲	<u>Revocation Date</u> ▲	<u>Revocation Posting Date</u> ▲
22-2997358	DOC HURLEY SCHOLARSHIP FOUNDATION	HARTFORD	CT 06105	US 501(c)(3)	15-May-2011	22-Feb-2012

« Prev | 1-1 | Next »



Exempt Organizations Select Check[Exempt Organizations Select Check Home](#)

Automatic Revocation of Exemption Information

The federal tax exemption of this organization was automatically revoked for its failure to file a Form 990-series return or notice for three consecutive years. The information listed below for each organization is *historical*; it is current as of the organization's effective date of automatic revocation. The information is not necessarily current as of today's date. Nor does this automatic revocation necessarily reflect the organization's tax-exempt or non-exempt status. The organization may have applied to the IRS for recognition of exemption and been recognized by the IRS as tax-exempt *after* its effective date of automatic revocation. To check whether an organization is currently recognized by the IRS as tax-exempt, call Customer Account Services at (877) 829-5500 (toll-free number).

Revocation Date (effective date on which organization's tax exemption was automatically revoked):

15-May-2011

Employer Identification Number (EIN):

22-2997358

Legal Name:

DOC HURLEY SCHOLARSHIP FOUNDATION

Doing Business As:**Mailing Address:**103 WOODLAND ST
HARTFORD, CT 06105-1233
United States**Exemption Type:**

501(c)(3)

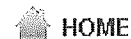
Revocation Posting Date (date on which IRS posted notice of automatic revocation on IRS.gov):

22-Feb-2012

[Return to Search Results](#) [Return to Search Page](#)

Exhibit B

Business Inquiry



Filing History

Business ID

Business Name

0236020

DOC HURLEY SCHOLARSHIP FOUNDATION, INC.

Filing Number	Filing Date/Time	Effective Date/Time	Filing Type	Volume Type	Volume	Start Page	Page #
0000265110	12:00 AM		REPORT(1990)				0
0000265105	Jul 07, 1989 12:00 AM		INCORPORATION	C	11430	0846	0
0000265106	Aug 24, 1989 12:00 AM		AMEND	C	11460	1632	0
0000265107	Nov 06, 1989 12:00 AM		ORG REPORT	C	11510	0684	0
0000265108	Jun 18, 1993 12:00 AM		NOTICE	C	12290	0600	0
0000265109	Oct 01, 1993 12:00 AM		FORFEITED	C	12370	0402	0
0002310899	Aug 30, 2001 4:20 PM	Aug 30, 2001 4:20 PM	RNST/RPT 2001	B	00438	1885	8
0002449892	Jul 25, 2002 1:36 PM	Jul 25, 2002 1:36 PM	REPORT (2002)	B	00511	3048	7
0002680529	Jul 21, 2003 8:30 AM	Jul 21, 2003 8:30 AM	REPORT (2003)	B	00630	1297	6
0002892107	Aug 16, 2004 8:30 AM		REPORT (2004)	B	00741	1571	7
0003083147	Aug 11, 2005 8:30 AM		REPORT (2005)	B	00847	1549	4
0003257154	Jul 26, 2006 4:03 PM		REPORT (2006)	B	00938	1464	2
0003516457	Aug 17, 2007 12:14 PM		REPORT (2007)	B	01071	3670	2

Back

Exhibit C

VOL 1143 0846

050947A002 07/10/89RH37010 9.00
050947A002 07/10/89RH00300 30.00
050947A002 07/10/89RH37100 25.00

**CERTIFICATE OF INCORPORATION
DOC HURLEY SCHOLARSHIP FOUNDATION, INC.
(NONSTOCK CORPORATION)**

We, the Incorporators, certify that we hereby associate ourselves as a body politic and corporate under the Nonstock Corporation Act of the State of Connecticut.

1. The name of the Corporation is: Doc Hurley Scholarship Foundation, Inc.

2. The nature of the activities to be conducted, or the purposes to be promoted or carried out by the Corporation, shall be exclusively charitable and educational, and shall be limited to providing scholarships for study in schools of higher education beyond the high school level to persons who are graduating Hartford area high school students, to graduating students attending high schools participating in the Annual Doc Hurley Basketball Classic, and to students that have received a Doc Hurley Scholarship and are attending an undergraduate college.

3. The Corporation is non-profit and shall not have or issue shares of stock or pay dividends.

4. The Corporation shall have no members.

5. A Board of Trustees consisting of thirteen (13) persons shall constitute the governing body of the Corporation. The initial Trustees of the Corporation shall be elected by the Incorporators. Thereafter, the election of Trustees shall be as

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prescribed in the Bylaws. which shall establish the qualifications, term of office and other requirements for such position.

6. The duration of the Corporation shall be unlimited.

7. No part of the net earnings of the Corporation shall inure to the benefit of, or be distributable to its Trustees, Officers, or other private persons, except that the Corporation shall be authorized and empowered to pay reasonable compensation for services rendered and to make payments and distributions in furtherance of the purposes set forth in Article 2 hereof. No substantial part of the activities of the Corporation shall consist of carrying on propaganda, or otherwise attempting to influence legislation, and the Corporation shall not participate in, or intervene in (including the publishing or distribution of statements) any political campaign on behalf of or in opposition to any candidate for public office. Notwithstanding any other provision of these articles, the Corporation shall not carry on any other activities not permitted to be carried on (a) by a corporation exempt from Federal income tax under Section 501(a) of the Internal Revenue Code of 1986 (hereinafter referred to by Section reference) as a charitable and educational organization described in Section 501(c)(3).

For any period during which it is a "private foundation," as defined in Section 509, the Corporation shall distribute its income for each taxable year at such time and in such manner as

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not to become subject to the tax on undistributed income imposed by Section 4942.

Among the activities in which the Corporation shall not engage for any period during which it is such a "private foundation are:

- (i) any act of self-dealing (as defined in Section 4941(d));
- (ii) retaining any excess business holdings (as defined in Section 4943(c));
- (iii) making any investment in such manner as to subject the Foundation to tax under section 4944; and
- (iv) making any taxable expenditure (as defined in Section 4945(d)).

8. The Corporation shall have all the powers and privileges which by the laws of the State of Connecticut are or may hereafter be conferred upon corporations without capital stock; provided, however, that no such powers and privileges may be exercised, nor shall any activities be conducted, by the Corporation if the same are inconsistent with the Corporation's exclusively charitable and educational purposes or are not permitted a corporation so exempt for federal income tax under Section 501(a).

9. In the event of dissolution of the Corporation, the Board of Trustees shall, after paying or making provision for the payment of all of the liabilities of the Corporation, dispose of any remaining assets of the Corporation to such organization or organizations organized and operated exclusively for charitable or

0849

educational purposes as shall at the time qualify as an exempt organization or organizations under Section 501(a) as an organization or organizations under Section 501(c)(3), as the Board of Trustees shall determine. Any such assets not so disposed of shall be disposed of by the Superior Court of Hartford County, Connecticut, exclusively for such purposes or to such organization or organizations, as said Court shall determine, which are organized and operated exclusively for such purposes.

10. Throughout this Certificate, reference to any Section shall be deemed to refer to a section of the Internal Revenue Code of 1986, as it hereinafter may be amended, and to the corresponding provision of any future United States Internal Revenue law.

DATED this 6th day of July, 1989.

We hereby declare, under the penalties of false statement, that the statements made in the foregoing Certificate are true.

INCORPORATORS

Walter J. Hurley, Sr.
Walter Hurley, Sr.

Melvin Plummer
Melvin Plummer

J. N. Johnson
Jay Johnson

RECEIVED
STATE OF CONNECTICUT
JUL 7 11 03 AM '89

DATE
BY
30 FTX
9 FF
25 Exp
#64

Rec: Beth Stengel
Murtha Cullina et al rec 7/10/89 WJ
185 Asylum ST
Hartford CT 06103 -4-

APPOINTMENT OF STATUTORY AGENT FOR SERVICE
DOMESTIC CORPORATION
61-6 Rev. 6/88

0850

Secretary of the State
30 Trinity Street
Hartford, CT 06106

VOL 1143

Name of Corporation:

Complete All Blanks

Doc Hurley Scholarship Foundation, Inc.

The above corporation appoints as its statutory agent for service, one of the following:

Name of Natural Person Who is Resident of Connecticut	Business Address	c/o Greater Hartford Chamber of Commerce	Zip Code
Peter Dunn	250 Constitution Plaza,	Hartford, CT	06103
	Residence Address	109 Westbrook Road,	Plantville, CT
			06479

Name of Connecticut Corporation	Address of Principal Office in Conn.	(If none, enter address of appointee's statutory agent for service)
---------------------------------	--------------------------------------	---

Name of Corporation (Not organized under the Laws of Conn.)*	Address of Principal Office in Conn. (If none, enter "Secretary of the State of Conn.")
--	---

* Which has procured a Certificate of Authority to transact business or conduct affairs in this state.

AUTHORIZATION

Original Appointment (Must be Signed by a majority of Incorporators)	Name of Incorporator (Print or Type)	Signed (Incorporator)	Date
	Walter Hurley, Sr.	<i>Walter Hurley, Sr.</i>	July 4, 1989
	Name of Incorporator (Print or Type)	Signed (Incorporator)	
	Melvin Plummer	<i>Melvin Plummer</i>	
	Name of Incorporator (Print or Type)	Signed (Incorporator)	
	Jay Johnson	<i>J. A. Johnson</i>	July 6, 1989

Subsequent Appointment	Name of President, Vice President or Secretary	Date
------------------------	--	------

Signed (President, or Vice President or Secretary)

Acceptance: Name of Statutory Agent for Service (Print or Type)	Signed (Statutory Agent for Service)
---	--------------------------------------

Peter Dunn

For Official Use Only

Rec; CC:

FILED

JUL 11 1989

[Signature]

Please provide filer's name and complete address for mailing receipt

AMENDMENT OR RESTATING CERTIFICATE OF INCORPORATION BY ACTION OF INCORPORATORS BOARD OF DIRECTORS BOARD OF DIRECTORS AND SHAREHOLDERS (Stock Corporation) BOARD OF DIRECTORS AND MEMBERS (Nonstock Corporation)

VOL 1146 1632

**STATE OF CONNECTICUT
SECRETARY OF THE STATE**

For office use only	
ACCOUNT NO.	
INITIALS	J

NAME OF CORPORATION: Doc Hurley Scholarship Foundation, Inc. DATE: August 24, 1989

2. The Certificate of Incorporation is A. AMENDED ONLY B. AMENDED AND RESTATED C. RESTATED ONLY by the following resolution:

RESOLVED: That Article 5 of the Certificate of Incorporation be amended in its entirety to read as follows:

5. A Board of Trustees consisting of sixteen (16) persons shall constitute the governing body of the Corporation. The initial Trustees of the Corporation shall be elected by the Incorporators. Thereafter, the election of the Trustees shall be as prescribed in the Bylaws, which shall establish the qualifications, term of office and other requirements for such position.

3. (Omit if 2.A is checked.)
- (a) The above resolution merely restates and does not change the provisions of the original Certificate of Incorporation as supplemented and amended to date, except as follows: (Indicate amendments made, if any; if none, so indicate.)
- (b) Other than as indicated in Par. 3(a), there is no discrepancy between the provisions of the original Certificate of Incorporation as supplemented to date, and the provisions of this Certificate Restating the Certificate of Incorporation.

BY ACTION OF INCORPORATORS	<input type="checkbox"/> 4. The above resolution was adopted by vote of at least two-thirds of the incorporators before the organization meeting of the corporation, and approved in writing by all subscribers (if any) for shares of the corporation, (or if nonstock corporation, by all applicants for membership entitled to vote, if any.)		
	We (at least two-thirds of the incorporators) hereby declare, under the penalties of false statement that the statements made in the foregoing certificate are true.		
	SIGNED	SIGNED	SIGNED
	APPROVED (All subscribers, or, if nonstock corporation, all applicants for membership entitled to vote, if none, so indicate)		
SIGNED	SIGNED	SIGNED	

(Over)

BY ACTION OF BOARD OF DIRECTORS

4. (Omit if 2.C is checked.) The above resolution was adopted by the board of directors acting alone, there being no shareholders or subscribers. the board of directors being so authorized pursuant to Section 33-241, Conn. G.S. as amended and no applicants for membership entitled to vote on such resolution.

5. The number of affirmative votes required to adopt such resolution is: 5 6. The number of directors' votes in favor of the resolution was: 7

We hereby declare, under the penalties of false statement that the statements made in the foregoing certificate are true.

NAME OF PRESIDENT OR VICE PRESIDENT (Print or Type) Walter J. Hurley, Sr. NAME OF SECRETARY OR ASSISTANT SECRETARY (Print or Type) Darryl Hale

SIGNED (President or Vice President) Walter J. Hurley, Sr. SIGNED (Secretary or Assistant Secretary) Darryl Hale

BY ACTION OF BOARD OF DIRECTORS AND SHAREHOLDERS

4. The above resolution was adopted by the board of directors and by shareholders.

5. Vote of shareholders:
(a) (Use if no shares are required to be voted as a class.)

NUMBER OF SHARES ENTITLED TO VOTE	TOTAL VOTING POWER	VOYE REQUIRED FOR ADOPTION	VOYE FAVORING ADOPTION

(b) (If the shares of any class are entitled to vote as a class, indicate the designation and number of outstanding shares of each such class, the voting power thereof, and the vote of each such class for the amendment resolution.)

We hereby declare, under the penalties of false statement that the statements made in the foregoing certificate are true.

NAME OF PRESIDENT OR VICE PRESIDENT (Print or Type) NAME OF SECRETARY OR ASSISTANT SECRETARY (Print or Type)

SIGNED (President or Vice President) SIGNED (Secretary or Assistant Secretary)

BY ACTION OF BOARD OF DIRECTORS AND MEMBERS

4. The above resolution was adopted by the board of directors and by members.

5. Vote of mem. rs:
(a) (Use if no members are required to vote as a class)

NUMBER OF MEMBERS VOTING	TOTAL VOTING POWER	VOYE REQUIRED FOR ADOPTION	VOYE FAVORING ADOPTION

(b) (If the members of any class are entitled to vote as a class, indicate the designation and number of members of each such class, the voting power thereof, and the vote of each such class for the amendment resolution.)

We hereby declare, under the penalties of false statement that the statements made in the foregoing certificate are true.

NAME OF PRESIDENT OR VICE PRESIDENT (Print or Type) NAME OF SECRETARY OR ASSISTANT SECRETARY (Print or Type)

SIGNED (President or Vice President) SIGNED (Secretary or Assistant Secretary)

For office use only

FILED
STATE OF CONNECTICUT
AUG 24 1 24 PM '88
REC'D

FILING FEE \$ <u>9</u>	CERTIFICATION FEE \$ <u>12.00</u>	TOTAL FEE <u>\$21.00</u>
MURTHA, CULLINA, RICHTER and PINNEY CITYPLACE - P. O. BOX 3197 HARTFORD, CONNECTICUT 06103		
DATE <u>REC & CC SENT: 11/09/89</u>	BY <u>ML</u>	FEE <u>ML</u>

2

VOL 1151 0684

ORGANIZATION & FIRST BIENNIAL REPORT
(Domestic Nonstock Corporation)

NOTE: Filing Fee \$7.50. Under the provisions of the Connecticut General Statutes, all nonstock corporations are required to file the organization and first biennial report within 30 days of the organization meeting. SUBSEQUENT REPORTS shall be filed biennially on or before the last business day of the month in which occurs the anniversary of the filing of the corporation's certificate of incorporation as shown on the records of the Secretary of the State. All blanks must be completed.

- 1. Name of Corporation: Doc Hurley Scholarship Foundation, Inc.
- 2. Date of Organization Meeting: July 12, 1989
- 3. Address of Principal Office in Connecticut (if none, so state):

250 Constitution Plaza Hartford, CT 06103

4a. OFFICERS: (no post office box number)

NAME	TITLE	RESIDENCE ADDRESS	BUSINESS ADDRESS
Both Addresses Must be Completed			
	*	*	*
	*	*	*
	*	*	*
	*	*	*
	*	*	*
	*	*	*
	*	*	*
	*	*	*

(see attached sheets)

4b. DIRECTORS: (no post office box number)

NAME	TITLE	RESIDENCE ADDRESS	BUSINESS ADDRESS
Both Addresses Must be Completed			
	*	*	*
	*	*	*
	*	*	*
	*	*	*
	*	*	*
	*	*	*
	*	*	*
	*	*	*

(see attached sheets)

I HEREBY DECLARE UNDER THE PENALTIES OF FALSE STATEMENT THAT THE STATEMENTS MADE IN THE FOREGOING CERTIFICATE ARE TRUE:

Date 10/30/89 * by Daniel Dale * Title Secretary
Officer's Signature

for official use only
STATE OF CONNECTICUT
NOV 6 1989

* 3709	* 3410	* credit/date*	Total
*	*	*	*
* 12-	*	*	* 12-
Date: _____			
* Rec CC GS Sent to: <u>12/19/89 ML</u>			
* <u>Mr. DANIEL DALE</u>			
* <u>51 NICK ST</u>			
* <u>East Hartford, CT</u>			

[Handwritten signature]

06103

0685

DOC HURLEY SCHOLARSHIP FOUNDATION, INC.

ORGANIZATION REPORT

Trustees and Officers

The Trustees and Officers are as follows:

<u>Name</u>	<u>Address</u>	<u>Position with Foundation</u>
Mr. Walter J. "Doc" Hurley, Sr.	(B) Hartford Housing Authority 475 Flatbush Avenue Hartford, CT 06115	Trustee and President
	(R) 289 Ridgefield Street Hartford, CT 06112	
Attorney Darryl Hale	51 Brook Street East Hartford, CT 06108 (Business & Residence)	Trustee and Secretary
Mr. John A. Hogan President	(B) Connecticut Savings and Loan Association Main Street Hartford, CT 06103	Trustee and Treasurer
	(R) 73 Regency Drive Bloomfield, CT 06002	
Mr. Melvin Plummer, Jr. Vice President	(B) The Hartford Insurance Group 200 Executive Boulevard Southington, CT 06489	Trustee
	(R) 301 Kennedy Road Manchester, CT 06118	
Ms. Jay Johnson Manager, Public Relations Ralph A. Hart Division	(B) Heublein, Inc. Munson Road Farmington, CT 06034-0388	Trustee
	(R) 50 East Hill Road 8-K Canton, CT 06019	
Mr. Vincent H. Shaheen Vice President Director of Marketing and Sales	(B) The Bank of Hartford 108 Farmington Avenue Hartford, CT 06105	Trustee
	(R) 60 Hillside Avenue Vernon, CT 06066	
Mr. Timothy J. Moynihan President	(B) The Greater Hartford Chamber of Commerce 250 Constitution Plaza Hartford, CT 06103	Trustee
	(R) 190 Naubuc Avenue East Hartford, CT 06118	

0686

Mr. Tad May	(B)	May, Bonee & Company, Inc. 3 Constitution Plaza Hartford, CT 06103	Trustee
	(R)	802 Prospect Street Wethersfield, CT 06109	
Mr. Anthony M. Caruso	(B)	Hartford Downtown Council 250 Constitution Plaza Hartford, CT 06103	Trustee
	(R)	8 Pondview Drive Canton, CT 06019	
Mr. Eddie Davis Principal	(B)	Weaver High School 415 Granby Street Hartford, CT 06112	Trustee
	(R)	242 Oxford Street Hartford, CT 06105	
Mr. Paul Copes Superintendent	(B)	Bloomfield School System Bloomfield, CT 06002	Trustee
	(R)	4 Ivory Road Bloomfield, CT 06002	
Mr. Walter J. "Doc" Hurley, Jr. Vice President Marketing I.O.F.	(B)	805 Brook Street Rocky Hill, CT	
	(R)	289 Ridgefield Street Hartford, CT 06112	
Mr. John Wadlaw	(B)	Hartford Housing Authority 475 Flatbush Avenue Hartford, CT 06115	Trustee
	(R)	124 Huggard Road Hartford CT 06114	
Attorney John D'Amico	(B)	Reid & Riege, P.C. 1 State Street Hartford, CT 06103	Trustee
	(R)	30 Marjorie Circle Hebron, CT 06248	
Mr. Louis Bazzano Supervisor Health & Physical Education	(B)	Hartford Board of Education 249 High Street Hartford, CT 06103	Trustee
	(R)	335 Robbins Avenue Newington, CT 06111	
Mr. Milton Lewis Howard	(B)	Milton Lewis Howard Associates Inc. 129 Weston Street Hartford, CT 06120	Trustee
	(R)	21 Banbury Lane Bloomfield, CT 06002	

CERTIFICATE OF REINSTATEMENT STOCK OR NON-STOCK CORPORATION

Office of the Secretary of the State
30 Trinity Street / P.O. Box 150470 / Hartford, CT 06115-0470/Rev. 12/1999

See reverse for instruction

Space F FILING #0002310899 PG 01 OF 08 VOL B-00438
FILED 08/30/2001 04:20 PM PAGE 01885
SECRETARY OF THE STATE
CONNECTICUT SECRETARY OF THE STATE

1. NAME OF CORPORATION:

Doc Hurley Scholarship Foundation, Inc.

2. PLACE A CHECK MARK NEXT TO A. OR B.:

- A. The corporation is a Connecticut Stock Corporation.
- B. The corporation is a Connecticut Non-stock Corporation.

3. APPOINTMENT OF REGISTERED AGENT: (Please select one A. or B.)

A. Individual's Name:

~~Kenneth J. Delisa~~

Business address:

~~285 Broad Street
Hartford, CT 06115~~

Residence address:

~~125 Stratford Street
Stratford, CT 06424~~

B. Business Entity:

The Hartford Courant Company

Address:

285 Broad Street
Hartford, CT 06115

Acceptance of appointment

By: Kenneth J. Delisa *Kenneth J. Delisa* Signature of agent
Corporate Affairs Manager

4. EXECUTION:

Dated this 22 day of August, 2001.

KENNETH J. DELISA	Corporate Affairs Manager	<i>Kenneth J. Delisa</i>
Print or type name of signatory	Capacity of signatory	Signature



STATE OF CONNECTICUT

DEPARTMENT OF REVENUE SERVICES

TWENTY FIVE SIGOURNEY STREET

HARTFORD, CONNECTICUT 06106



August 14, 2001

FILING #0002310899 PG 02 OF 08 VOL B-00438
FILED 08/30/2001 04:20 PM PAGE 01886
SECRETARY OF THE STATE
CONNECTICUT SECRETARY OF THE STATE

Mrs. Muriel Hurley-Carter
P.O. Box 4008
Hartford, CT 06147

CT Tax Reg #:5857602-000

Dear Taxpayer:

The Connecticut Secretary of the State will require the following release from the Department of Revenue Services in addition to the Connecticut Labor Department release, Application for Reinstatement and applicable filing fee. These documents should be mailed or delivered to the Office of the Secretary of the State, Corporation Division, 30 Trinity Street, Hartford, CT 06115.

In accordance with the provisions of Section 33-1183 of the General Statutes of Connecticut, Revision of 1958 as amended, you are hereby advised that Doc Hurley Scholarship Foundation, Inc.

- 1. Has paid all taxes due and payable to the Commissioner of Revenue Services.
- 2. Was not liable for any taxes payable to the Commissioner of Revenue Services.
- 3. Has made an adequate provision for future payment of any unpaid taxes due and payable to the Commissioner of Revenue Services.

Sincerely,

Raymond A. Perkins
MB

Raymond A. Perkins
Tax Unit Manager
Corporation Tax Office Unit
Telephone: (860) 541-4541

RAP:MG
AU-836(non stock)Rev. 10/96



STATE OF CONNECTICUT

DEPARTMENT OF REVENUE SERVICES

TWENTY FIVE SIGOURNEY STREET

FILING #0002310899 PG 03 OF 08 VOL B-00438
FILED 08/30/2001 04:20 PM PAGE 01887
SECRETARY OF THE STATE
CONNECTICUT SECRETARY OF THE STATE



Reinstatement Guarantee Declaration for Nonstock Corporation

1. WALTER J. HURLEY, JR. state that:
(Name)

1. I am the TRUSTEE of
(Title)

DCC HURLEY SCHOLARSHIP FOUNDATION, INC. and I am duly authorized to
(Name of Corporation) execute this declaration on behalf of the corporation.

2. The corporation guarantees full payment of any accounts payable to the Commissioner of Revenue Services that are determined to be due and are lawfully assessed against

DCC HURLEY SCHOLARSHIP FOUNDATION, INC.
(Name of Reinstating Corporation)

for any taxable period during which the company was subject to these taxes according to the Connecticut General Statutes.

I declare under penalties of false statement that I have examined this declaration and to the best of my knowledge and belief it is true, complete and correct. (The penalty for false statement is imprisonment not to exceed one year or a fine not to exceed one thousand dollars, or both.)

Walter J. Hurley, Jr. Trustee 8/14/2001
Signature of Principal Officer Title Date

Connecticut
Department of Labor
Working with you for a better future.

UC-89
(Rev. 4/98)

August 20, 2001

Office of the Secretary of the State
Corporation Division
30 Trinity Street
Hartford, Connecticut 06106

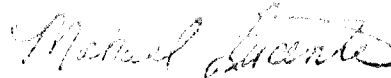
Re: Doc Hurley Scholarship Foundation, Inc.

In accordance with the provisions of the General Statutes of the State of Connecticut - Revision of 1958, as amended, you are hereby notified that by the best available information, it is our belief the subject corporation has made acceptable provisions for future payment of contributions due to the Department of Labor.

Very truly yours,



Shaun B. Cashman
Administrator
Unemployment Compensation



Michael Lucente
Supervisor, Employer Status Unit

GP

CONNECTICUT SECRETARY OF THE STATE
Document Review
30 Trinity Street
Hartford, CT 06106-0470

FILING #0002310899 PG 05 OF 08 VOL B-00438
FILED 08/30/2001 04:20 PM PAGE 01889
SECRETARY OF THE STATE
CONNECTICUT SECRETARY OF THE STATE

1. Name of Corp: DOC HURLEY SCHOLARSHIP FOUNDATION, INC.
2. Business ID: 0236020
3. Report due in the month of: AUGUST, 2001.
4. This corporation is DOMESTIC/NON-STOCK. Fee is \$25.00.

Corporate Name: DOC HURLEY SCHOLARSHIP FOUNDATION, INC.

Mailing Address: 250 CONSTITUTION PLAZA
HARTFORD, CT 06103

Changes: 103 Woodland Street
Hartford, CT 06105

5. Principal Office Address: Changes:
(in CT only)

103 Woodland Street
Hartford, CT 06103

6. Executive Office Address:
(Foreign Corps Only)

7. Principal Office in State of Formation:
(Foreign Corps Only)

8. Attached hereto are the officers and directors of the corporation with their business and residence addresses.

9. Date: 8 / 27 / 01
Mo Da Yr

10. Signature:

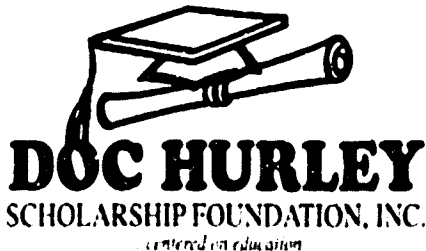
Print Signatory Name:

Print Capacity:

Muriel Hurley-Carter
Muriel Hurley-Carter
Executive Director

“Doc” Hurley Scholarship Foundation, Inc. Trustee Board

- ✓ **Walter “Doc” Hurley, Sr.**, *Founding President*
 - ✓ **Muriel Hurley-Carter**, *Executive Director*
 - ✓ **Kenneth DeLisa**, The Hartford Courant, *Chairman*
 - ✓ **Patrice Wood**, Fleet Boston Financial Group, *Treasurer*
 - ✓ **Joseph McGann**, VNA Healthcare, Inc., *Secretary*
-
- ✓ **Lou Bazzano**
 - ✓ **Carl Chadburn**, Phoenix Home Life Mutual Insurance Company
 - ✓ **Hon. Eric Coleman, Esq.**, Connecticut State Senate
 - ✓ **Dr. Paul Copes**, Community Renewal Team
 - ✓ **Brad Davis**, WDRC Radio
 - ✓ **Dr. Eddie Davis**, State Department of Education
 - ✓ **Dr. Richard Fichman**, Fichman Eye Center
 - ✓ **Rick Hazelton**, Trinity College
 - ✓ **Walter Hurley, Jr.**, State Department of Revenue Services
 - ✓ **Jay Margnelli**, Coca-Cola Bottling, Co.
 - ✓ **Dr. John Norman**, Northwestern CT Community College
 - ✓ **Peter Odlum, Esq.**, Bayer, Odlum & Hyde
 - ✓ **Victor Rush**, Hartford Housing Authority
 - ✓ **Edwin Santos**, Fleet Financial Group
 - ✓ **John Wilson**, Phoenix Home Life Mutual Insurance Company



Trustee Name & Title:

✓ Lou Bazzano, Retired Athletic Director

Business Address:

335 Robbins Ave.
Newington, CT 06111-3746

Residential Address:

335 Robbins Ave.
Newington, CT 06111

Trustee Name & Title:

✓ Hon. Eric Coleman, Esq., State Senator

Business Address:

Connecticut State Senate
101 Oak Street
Hartford, CT 06106

Residential Address:

77 Wintonbury Ave.
Bloomfield, CT 06002

Trustee Name & Title:

✓ Brad Davis, Talk Show Host

Business Address:

WDRC Radio
869 Blue Hills Ave.
Bloomfield, CT 06002

Residential Address:

400 Seabury Drive
Bloomfield, CT 06002

Trustee Name & Title:

✓ Kenneth DeLisa, Corporate Affairs Manager

Business Address:

The Hartford Courant
285 Broad Street
Hartford, CT 06115

Residential Address:

120 Straddle Hill
Wethersfield, CT 06109

Trustee Name & Title:

✓ Rick Hazelton, Athletic Director

Business Address:

Trinity College
Ferris Athletic Ctr 300 Summitt St.
Hartford, CT 06106

Residential Address:

308 Kennedy Road
Windsor, CT 06095

Trustee Name & Title:

✓ Carl Chadburn, Vice President

Business Address:

Phoenix Home Life Mutual Ins. Co.
One American Row P.O. Box 5056
Hartford, CT 06102-5056

Residential Address:

252 Knollwood Road
Manchester, CT 06040

Trustee Name & Title:

✓ Dr. Paul Copes, Exec. Director of Education

Business Address:

Community Renewal Team
555 Windsor Street
Hartford, CT 06112

Residential Address:

90 Springwood Road
Bloomfield, CT 06002

Trustee Name & Title:

✓ Dr. Eddie Davis, Bureau Chief

Business Address:

State Department of Education
165 Capitol Ave.
Hartford, CT 06106

Residential Address:

242 Oxford Street
Hartford, CT 06105

Trustee Name & Title:

✓ Dr. Richard Fichman, Doctor

Business Address:

Fichman Eye Center
178 Hartford Road
Manchester, CT 06040

Residential Address:

40 Prattling Pond Road
Farmington, CT 06032

Trustee Name & Title:

✓ Walter Hurley, Jr., Tax Representative

Business Address:

State Department of Revenue Service
25 Sigourney Street
Hartford, CT 06106

Residential Address:

289 Ridgefield Street
Hartford, CT 06112

Trustee Name & Title:

✓Walter "Doc" Hurley, Sr., Foundation President

Business Address:

289 Ridgefield Street
Hartford, CT 06112

Residential Address:

289 Ridgefield Street street
Hartford, CT 06112

Trustee Name & Title:

✓Joseph McGann, Vice President of Development

Business Address:

VNA Healthcare, Inc.
103 Woodland Street
Hartford, CT 06105-1240

Residential Address:

26 Maplewood Ave
West Hartford, CT 06119

Trustee Name & Title:

✓Muriel Hurley-Carter, Executive Director

Business Address:

Doc Hurley Scholarship Foundation, Inc.
103 Woodland Street
Hartford, CT 06105

Residential Address:

60 Silo Way
Bloomfield, CT 06002

Trustee Name & Title:

✓Victor Rush, Director of Human Services

Business Address:

Hartford Housing Authority
475 Flatbush Ave.
Hartford, CT 06106-3761

Residential Address:

49 High Street
Windsor, CT 06095

Trustee Name & Title:

✓John Wilson, Director of Community Relations

Business Address:

Phoenix Home Life Mutual Ins. Co.
One American Row P.O. Box 5056
Hartford, CT 06102-5056

Residential Address:

304 Branford Street
Hartford, CT 06112

Trustee Name & Title:

✓Jay Margnelli, Director of Marketing

Business Address:

Coca-Cola Bottling Co.
65 Roberts Street
East Hartford Hartford, CT 06108

Residential Address:

6 Benjamin Drive
Ellington, CT 06029

Trustee Name & Title:

✓Dr. John Norman, Ph.D., Director of Education

Business Address:

Northwestern CT Community College
Park Place
Winsted, CT 06098

Residential Address:

12 Wickham's Fancy
Collinsville, CT 06022

Trustee Name & Title:

✓Peter Odlum, Esq., Attorney

Business Address:

Bayer, Odlum & Hyde
250 Main Street
Hartford, CT 06106

Residential Address:

15 Beechtree Lane
West Hartford, CT 06107

Trustee Name & Title:

✓Edwin Santos, Exec. Vice President, Managing Director

Business Address:

Fleet Boston Financial
50 Kennedy Plaza - 18th floor
Providence, RI 02903-2305

Residential Address:

234 Mourning Dove Drive
Saunderstown, RI 02874

Trustee Name & Title:

✓Patrice Wood, Assistant Vice President

Business Address:

Fleet Boston Financial
20 Church St-One Corp. Ctr - CTEH 40623
Hartford, CT 06103

Residential Address:

80 Sutton Place
Bloomfield, CT 06002

CONNECTICUT SECRETARY OF THE STATE

Document Review

30 Trinity Street
P.O. Box 150470
Hartford, CT 06115-0470

FILING #0003516457 PG 1 OF 2
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FILED 08/17/2007 12:14 PM
CONNECTICUT SECRETARY OF THE STATE

1. Name of Corporation: DOC HURLEY SCHOLARSHIP FOUNDATION, INC.

2. Business ID: 0236020

3. Report due in the month of: July, 2007

4. This Corporation is: DOMESTIC/NON-STOCK

Fee is: \$25.00

Corporate Name: DOC HURLEY SCHOLARSHIP FOUNDATION, INC.

Mailing Address: 103 WOODLAND STREET
HARTFORD,CT 06105

Changes: _____

5. Principal Office Address (in CT Only) : 103 WOODLAND STREET
HARTFORD,CT 06105

Changes: _____

6. Executive Office Address (Foreign Corps Only):

Changes: _____

7. Principal Office in State of Formation (Foreign Corps Only):

Changes: _____

8. Attached hereto are the officers and directors of the corporation with their business and residence addresses.

9. Date: 08/17/2007

10. Signature:

Print Signatory Name: MURIEL HURLEY-CARTER

Print Capacity: EXECUTIVE DIRECTOR

Report Officers/Directors

Business ID : 0236020

FILING # 0003516457 PG 2 OF 2
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FILED 08/17/2007 12:14 PM
CONNECTICUT SECRETARY OF THE STATE

1. Full Legal Name:

WALTER "DOC" HURLEY, SR.

Title(s):

FOUNDATION PRESIDENT

Residence Addr:

289 RIDGEFIELD ST
HARTFORD,CT 06112

Business Addr:

289 RIDGEFIELD ST
HARTOFRD,CT 06119

Res Changes:

Bus Changes:

2. Full Legal Name:

MURIEL HURLEY-CARTER

Title(s):

EXECUTIVE DIRECTOR

Residence Addr:

60 SILO WAY
BLOOMFIELD,CT 06002

Business Addr:

DOC HURLEY SCHOLARSHIP FOUNDATION INC
103 WOODLAND ST
HARTFORD,CT 06105

Res Changes:

Bus Changes:

3. Full Legal Name:

LOU BAZZANO

Title(s):

RETIRED DIRECTOR OF PHYSICAL EDUCATION

Residence Addr:

335 ROBBINS AVENUE
NEWINGTON,CT 06111

Business Addr:

335 ROBBINS AVENUE
NEWINGTON,CT 06111

Res Changes:

Bus Changes:

Exhibit D

State of Connecticut Online Enterprise Site

State of Connecticut

Lookup Detail View**Name and Address**

Name	Address
DOC HURLEY SCHOLARSHIP FOUNDATION INC.	103 WOODLAND STREET HARTFORD, CT 06105

Credential Information

License Information

Registration	Registration Type	Effective Date	Expiration Date	Status
CHR.0001742	PUBLIC CHARITY	12/20/2006	05/31/2007	INACTIVE

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