



OFFICE OF THE SECRETARY OF STATE
STATE OF GEORGIA

IN THE MATTER OF

Heels for Combat Boots

Respondent.

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Case Number: ENCH-170220

ORDER TO CEASE AND DESIST

Pursuant to the authority of the Georgia Charitable Solicitations Act of 1988, as amended, O.C.G.A. § 43-17-1, *et seq.* (“Act”), and 590-9-1, *et seq.* of the Rules and Regulations of the State of Georgia (“Rules”), the Secretary of State of the State of Georgia (“Secretary”), has caused an investigation to be made into the acts and practices of **Heels for Combat Boots** (“Respondent”). As a result of the investigation, the Secretary makes the following findings of fact and conclusions of law:

I. FINDINGS OF FACT

1. Respondent is a South Carolina non-profit corporation. Respondent is not registered with the Georgia Corporations Division. The principal office address of Respondent is listed as 2479 Country Club Road 1500G, Spartanburg, South Carolina 29302. Kati Sorensen (“Sorensen”) is listed in corporate documents as the Respondent’s registered agent.

2. Based on the Secretary’s investigation, it is believed that the Respondent’s operations have moved to 1201 New Market Road, Tryon, NC 28782.

3. Respondent is a 501(c)(3) organization registered with the Internal Revenue Service (“IRS”).

4. Respondent has represented itself on its websites and through marketing materials as a charitable organization as defined by O.C.G.A. § 43-17-2(2) and therefore is subject to the Act and Rules.

5. Respondent is not registered with the Secretary as a charitable organization pursuant to O.C.G.A. § 43-17-5.

II. CONCLUSIONS OF LAW

6. Paragraphs 1 through 5 are incorporated by reference as though fully set forth herein.

7. The Commissioner has jurisdiction over this matter pursuant to the Act.

8. Pursuant to O.C.G.A. §§ 43-17-11 and 43-17-13, the Commissioner is authorized to institute

this investigation and issue this Order.

9. Pursuant to O.C.G.A. § 43-17-13(a)(1)(A)(i), the Commissioner may issue a cease and desist order against any person that has engaged in or is engaging in or is about to engage in any act, practice, or transaction which is prohibited by the [Act] or by any rule, regulation, or order of the Secretary.

10. Pursuant to O.C.G.A. § 43-17-5(a), it is “unlawful for any person: ... (2) [w]hile in this state to solicit or accept charitable contributions from any person, wherever located...unless the charitable organization on whose behalf such contributions are being solicited or accepted is subject to an effective registration statement under this chapter or exempt from registration” pursuant to Code Section 43-17-9.

11. Respondent’s solicitation of charitable contributions from Georgia citizens, without registering with the Secretary, is a violation of O.C.G.A. § 43-17-5. As a result of the violation, Respondent is subject to penalty under O.C.G.A. § 43-17-13.

III. ORDER

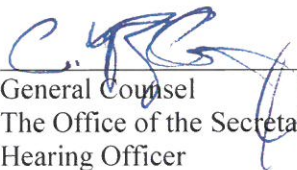
WHEREFORE, by the authority vested in me as the Secretary of State for the State of Georgia, **IT IS HEREBY ORDERED:**

1. **Heels for Combat Boots CEASE AND DESIST** from all violations of the Georgia Charitable Solicitations Act of 1988, as amended.

The entry of this Order is deemed to be in the public interest, and shall not be deemed to constitute findings or conclusions relating to other persons unrelated to Respondent and shall not be deemed to be a waiver or estoppel on the part of the Secretary of State from proceeding in individual actions against any person who may have violated the Act or any transactions not specifically referred to herein or not known to the Commissioner at the time this Order was issued.

SO ORDERED this 31st day of May, 2018.

BRIAN P. KEMP
SECRETARY OF STATE

By: 
General Counsel
The Office of the Secretary of State, Brian P. Kemp
Hearing Officer