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**COMPLAINT TO THE CALIFORNIA ATTORNEY GENERAL  
REGARDING A CHARITY OR CHARITABLE SOLICITATION**

Name of organization: \_\_\_\_\_

List any other names the organization uses: \_\_\_\_\_

Address of organization: \_\_\_\_\_

City, State, ZIP: \_\_\_\_\_

Organization Telephone Number: \_\_\_\_\_ Organization Web address: \_\_\_\_\_

Other identifying information for the corporation, if known:

Corporate # \_\_\_\_\_ State Charity Registration # \_\_\_\_\_ FEIN: \_\_\_\_\_

Briefly summarize the main points of your complaint here:

(Attach additional pages for the details of your complaint, if necessary)

Have charitable funds or other assets been lost, wasted or diverted from proper charitable purposes? Or, is there a danger that such loss will soon occur? Please explain, giving your best estimate of the amount lost or at risk, if you know:

What action has already been taken, either within the organization or with other law enforcement agencies, to try to resolve this problem:

List the names, addresses and telephone numbers, if known, of all persons you believe may be responsible for this problem:

List the name, address and telephone number of any other persons who may have additional information concerning the complaint:

Your name, address and telephone number: \_\_\_\_\_

\_\_\_\_\_ Date: \_\_\_\_\_

Check here if you request that your identity be kept confidential.

Check here if you authorize us to release your complaint, including your name and contact information, to law enforcement or other government agencies, as applicable.

Mail the completed form and any attachments to: Registry of Charitable Trusts, Office of the Attorney General, P.O. Box 903447, Sacramento, CA 94203-4470.

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## Central Valley Regional Water Quality Control Board

23 March 2015

Attachments for: Complaint to the California Attorney General Regarding a Charity or Charitable Solicitation: ***A Greener Globe Corporation***

### Item - 1

The Central Valley Regional Water Board (Central Valley Water Board) has concerns regarding whether A Greener Globe Corporation, a 501(c)(3) organization operates within the law. Below is a description of the preliminary findings that form the basis of a suspicion that this organization is not properly operating. The Central Valley Water Board recommends the Attorney General investigate and audit this charity further.

A Greener Globe owns and operates the landfill located at 901 Galleria Blvd., Roseville, CA 95678. The landfill is regulated by the Central Valley Water Board to protect the quality of groundwater beneath the closed landfill. This organization is under investigation by the Central Valley Water Board for systemic noncompliance with its water quality permits. Since at least 2010, the Central Valley Water Board has been requesting the necessary information from A Greener Globe to update their permit to properly regulate the facility. A Greener Globe has not responded, and in June 2011, the Central Valley Water Board issued waste discharge requirements requiring technical and monitoring reports to assess water quality impacts from the landfill. To date, A Greener Globe has not been forthcoming with such information, and on 20 January 2015, the Central Valley Water Board's Prosecution Team issued a \$677,531 Administrative Civil Liability for failure to complete water quality monitoring and submit reports. Given that A Greener Globe has generally failed to comply with their water quality permit, the Central Valley Water Board is concerned that A Greener Globe's noncompliance with the law is a pattern of behavior.

Below is a list of preliminary observations supporting a suspicion of impropriety by A Greener Globe:

- 1) The organization has failed to file annual financial disclosure reports with the AG's office.
- 2) The description of A Greener Globe's nonprofit activities in Part 4a, Section III of its Form 990 is not entirely consistent with the specific purpose for which the corporation is organized as identified in the Articles of Incorporation filed with the Secretary of State on December 7, 1993.
- 3) Schedule A of Form 990 reports no funds received from public support. The only source of support is derived from rents.
- 4) Schedule D of Form 990 reports over \$122,000 in attorney fees and over \$58,000 in loans/attorney services.
- 5) Form 990 states that the organization has a website: [www.greenglobe.org](http://www.greenglobe.org). No such website exists.
- 6) The organization incurs a significant amount in legal fees, more than any other expense.

- 7) The organization has reported over \$1.1 million in unsecured notes and loans payable in addition to over \$300,000 in loans to current or former officers, directors, trustees, key employees, highest compensated employees, or disqualified persons. For an organization with a public purpose of “recycling education,” loans of this amount seem suspicious.

**Item - 2**

Below is action already taken, either within the organization or with other law enforcement agencies, to try to resolve this problem:

- On 17 March 2015, the Attorney General’s office issued a “Warning Of Assessment Of Penalties And Late Fees, And Suspension Or Revocation Of Registered Status” letter to A Greener Globe Corporation.
- On 20 January 2015, the Central Valley Water Board issued a subpoena and interrogatories requesting information related to the financial viability and operations of the nonprofit. The information was due by 20 February 2015, but A Greener Globe has failed to respond.

**Item - 3**

Please direct any questions to:

California Regional Water Quality Control Board, Central Valley Region  
11020 Sun Center Drive, Suite 200, Rancho Cordova, CA 95670

Staff involved in this case:

- Vanessa Young, Staff Counsel – vyoung@waterboards.ca.gov; 916-327-8622
- Wendy Wyels, Environmental Program Manager – wwyels@waterboards.ca.gov; 916-464-4835
- Howard Hold, Senior Engineering Geologist – hhold@waterboards.ca.gov; 916- 464-4679
- Paul Sanders, Engineering Geologist – psanders@waterboards.ca.gov; 916-464-4817