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7 *Attorneys for the Registry of Charitable Trusts*

8  
9 BEFORE THE ATTORNEY GENERAL OF THE  
10 STATE OF CALIFORNIA

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13 **IN THE MATTER OF THE ORDER TO  
CEASE AND DESIST AND ASSESSMENT  
OF PENALTIES AGAINST:**

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15 **BRITTANY LITTLETON, INDIVIDUALLY  
AND ON BEHALF OF LITTLE LOVE  
16 RESCUE, INC. AND LITTLE LOVE  
RESCUE, INC.**

Case No. 2020-1610322

**ORDER TO CEASE AND DESIST AND  
ASSESSMENT OF PENALTIES**

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21 BRITTANY LITTLETON (LITTLETON), individually, and on behalf of LITTLE LOVE  
22 RESCUE, INC. and LITTLE LOVE RESCUE, INC., are ordered to immediately CEASE AND  
23 DESIST from all operations, including all solicitations for charitable purposes by any means,  
24 pursuant to Government Code Section 12591.1, subdivision (b). This order applies to LITTLE  
25 LOVE RESCUE, its officers, directors, employees and all persons or entities acting on its behalf.  
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1 **SUMMARY**

2 California regulates entities holding and soliciting charitable assets. An entity may not  
3 solicit charitable assets in California unless it is registered with the Attorney General and  
4 complies with the requirements of the Supervision of Trustees and Fundraisers for Charitable  
5 Purposes Act. (Gov. Code, § 12580, et seq., the “Supervision Act.”). LITTLE LOVE RESCUE  
6 and LITTLETON solicit charitable contributions without being registered.

7 **FINDINGS**

8 1. The Attorney General makes the following findings:

9 2. LITTLE LOVE RESCUE, filed articles of incorporation with the California  
10 Secretary of State on July 25, 2018. These articles of incorporation identify LITTLE LOVE  
11 RESCUE as a nonprofit public benefit corporation for charitable purposes. Its address of record  
12 is 19419 Pacific Coast Highway, Malibu, California. According to its articles of incorporation,  
13 LITTLE LOVE RESCUE’s purpose is to “take in animals from shelters and streets and adopt  
14 them to loving homes.” LITTLETON is listed as the Agent of Process for LITTLE LOVE  
15 RESCUE in the articles of incorporation. On information and belief, LITTLETON is a founder  
16 and director of LITTLE LOVE RESCUE.

17 3. LITTLE LOVE RESCUE is California Public Benefit Corporation that holds its  
18 assets subject to a charitable trust and is subject to the provisions of the Supervision Act pursuant  
19 to Government Code section 12581.

20 4. LITTLETON and others regularly post solicitations on behalf of LITTLE  
21 LOVE RESCUE on social media, including Facebook, Instagram, and crowd-sourcing websites,  
22 including but not limited to gofundme.com.

23 5. A person or entity must be registered and in good standing with the Registry of  
24 Charitable Trusts to operate or solicit for charitable purposes. (Cal. Code Regs., tit. 11, §  
25 999.9.4.)

26 6. Since its inception and as early as 2014, LITTLE LOVE RESCUE and  
27 LITTLETON solicited and continue to solicit donations through social media platforms. LITTLE  
28 LOVE RESCUE, at all times since its inception, could not legally solicit charitable donations or

1 engage in any activity for which registration with the Attorney General’s Registry of Charitable  
2 Trusts was required. (Gov. Code, § 12580, et seq., § 12599, subd. (f).) LITTLETON as founder  
3 and director of LITTLE LOVE RESCUE failed to register with the Registry of Trusts.

4 7. Charitable organizations are required to file annual reports with the Attorney  
5 General regarding their solicitation and use of charitable assets. LITTLE LOVE RESCUE and  
6 LITTLETON never filed any written reports with the Registry, including, the Registration  
7 Renewal Fee (Form RRF-1) Report or the appropriate version of the IRS Form 990, in violation  
8 of Government Code section 12586, subdivision (a) and California Code of Regulations, title 11,  
9 sections 301 through 306, and 311.

10 8. On at least one occasion, LITTLE LOVE RESCUE conducted a raffle to raise  
11 charitable funds. In August 2017, LITTLE LOVE RESCUE advertised a raffle for two tickets to  
12 an event on twitter.com and Instagram.

13 9. The August 2017 raffle violated California law. Charities operating in  
14 California can conduct a raffle, but only if they are tax exempt by the Franchise Tax Board, have  
15 been in business for one year and they must also first register their Raffle with the Attorney  
16 General’s Registry. Raffles are prohibited unless a charity strictly complies with the  
17 requirements of Penal Code section 320 and the California Code of Regulations. (Cal.Code Reg.,  
18 tit 11, §§ 410-425.)

19 10. LITTLE LOVE RESCUE failed to register its raffle with the Attorney  
20 General’s Registry as required by Penal Code Section 320.5 and section 415 of title 11, of the  
21 California Code of Regulations. Moreover, LITTLE LOVE RESCUE was not eligible to conduct  
22 a raffle because it does not fall under the definition of an “eligible organization” as provided by  
23 Penal Code section 320.5. LITTLE LOVE RESCUE is neither qualified to operate as a nonprofit  
24 in California and nor is it exempt from taxation under the Revenue and Taxation Code. (Pen.  
25 Code, § 320.5, subd (c).) In order to conduct a raffle, eligible organizations must also comply  
26 with all registration and reporting requirements provided by Penal Code section 320.5 and  
27 California Code of Regulations, title 11, sections 415 - 425.

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1           11.     LITTLETON and LITTLE LOVE RESCUE also violated Penal Code section  
2 320.5, subdivision (f)(2) by conducting and selling raffle tickets over the Internet.

3           12.     LITTLE LOVE RESCUE and LITTLETON also violated Government Code  
4 section 12599.6, subdivision (f) by using unfair and deceptive acts to solicit donations.  
5 LITTLETON represented to potential donors that donations to LITTLE LOVE RESCUE were tax  
6 deductible. This representation was false. LITTLE LOVE RESCUE was and is not a tax exempt  
7 organization. LITTLETON knew that the representations about the tax exempt status of LITTLE  
8 LOVE RESCUE were false and would likely mislead and deceive potential donors.

9           13.     On March 5, 2020, the Registry of Charitable Trusts issued to LITTLE LOVE  
10 RESCUE the First Notice to Register. The letter was sent to 19419 Pacific Coast Highway,  
11 Malibu, CA 90265. This address was listed both as LITTLETON and LITTLE LOVE  
12 RESCUE's address with the Secretary of State. LITTLE LOVE RESCUE failed to register as  
13 required by California law.

14           14.     On May 14, 2020, the Registry of Charitable Trusts issued to LITTLE LOVE  
15 RESCUE the Final Notice to Register. The letter was again served on the address of record  
16 provided by LITTLETON and LITTLE LOVE RESCUE to the Secretary of State.  
17 Again LITTLE LOVE RESCUE failed to register.

18           15.     At all times, including the present, LITTLETON and LITTLE LOVE RESCUE  
19 continues to solicit from the public across multiple platforms, including but not limited to  
20 littleloverescue.org, Instagram, Facebook, and through GoFundMe campaigns.

21           16.     LITTLE LOVE RESCUE and LITTLETON embarks on fundraising campaigns  
22 for specific "rescued pets." LITTLE LOVE RESCUE is prohibited from raising funds for any  
23 charitable purpose in California. To the extent that LITTLE LOVE RESCUE raised funds to  
24 purportedly assist specific rescued animals, those funds were restricted for those charitable  
25 purposes. (Bus. & Prof. Code, § 17510.8.) On information and belief, LITTLE LOVE RESCUE  
26 has failed to account for its restricted funds and also failed to protect or use its restricted funds  
27 according to the charitable trust in which they were solicited.

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1 **GROUND S FOR ISSUANCE OF THE CEASE AND DESIST ORDER**

2 17. Grounds for the issuance of a cease and desist order exist against LITTLE  
3 LOVE RESCUE and LITTLETON pursuant to California Government Code section 12591.1,  
4 subdivision (b), section 12599.6 subdivisions (a) and (f), and California Code of Regulations, title  
5 11, sections 300-306, 415-418, 420 because of the following acts:

- 6 a. LITTLETON and LITTLE LOVE RESCUE solicited funds for charitable  
7 purposes in California without being registered with the Registry;
- 8 b. LITTLE and LITTLE LOVE RESCUE failed to file the annual reports  
9 required by law with the Registry;
- 10 c. LITTLETON and LITTLE LOVE RESCUE engaged in an illegal raffle by  
11 failing to register and file required forms and by engaging in a raffle when  
12 LITTLE LOVE RESCUE did not meet the legal requirements for such a  
13 raffle;
- 14 d. LITTLETON and LITTLE LOVE RESCUE misrepresented its tax exempt  
15 status of donations and misled donors

16 **ASSESSMENT OF PENALTIES**

17 18. Pursuant Government Code section 12591.1, subdivision (c), and California  
18 Code of Regulations, title 11, sections 315 and 999.6, subdivision (a)(3), the Attorney General  
19 may assess a penalty up to \$1,000 for each act or omission that constitutes a violation. The  
20 assessment of penalties is in addition to all other remedies available to the Attorney General and  
21 the Attorney General reserves the right to assert all other remedies.

22 19. The Attorney General assesses the following penalties against LITTLETON  
23 and LITTLE LOVE RESCUE:

	<b>VIOLATION</b>	<b>AMOUNT</b>
26 27 28	a. Failure to register with the Registry of Charitable Trusts, in violation of 12585, within the time required by law, in violation of Government Code section 12599, subdivision (d) and California Code of Regulations, title 11, section 308.	\$1,000.00

1	b.	Failure to file Period Written Reports in violation of California Code of Regulations, title 11, section 301 for every year Little Love Rescue solicited and received donations.	\$6,000.00 (6 x \$1000)
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3	c.	Soliciting charitable donations in violation of Government Code section 12599, subdivision (f); California Code of Regulations, title 11, sections 308 and 999.9.4. Each solicitation constitutes a separate violation. The penalties assessed are currently limited to 100 solicitations, however, the Attorney General reserves the right to amend this amount when LITTLE LOVE RESCUE provides the information requested below.	\$50,000.00 (500 x 100)
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6	d.	Conducting an unlawful raffle in violation of Penal Code sections 319, 320 and 320.5; California Code of Regulations, title 11, section 415.	\$1,000.00
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10		<b>TOTAL PENALTY:</b>	\$58,000.00
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20. The penalties listed above will become effective five days after the service of this notice. Penalties will continue to accrue at the rate of \$100 per day per violation until the Attorney General receives written confirmation that LITTLE LOVE RESCUE has ceased all operations and fully complied with the order below.

**ORDER**

1. LITTLE LOVE RESCUE and BRITTANY LITTLETON shall immediately CEASE AND DESIST from all charitable operations, including all solicitations for charitable purposes by any means. This order applies to LITTLE LOVE RESCUE, LITTLETON and all officers, directors, employees, independent contractors and volunteers of LITTLE LOVE RESCUE, and all other persons or entities acting on its behalf.

2. Within 15 days from the date of this order, LITTLE LOVE RESCUE and LITTLETON shall:

- a. Provide written confirmation that it is in compliance with this order, including proof of service of the order as required by Item No. 4.
- b. Provide a copy of every adverse action against it by a governmental entity. Pursuant to California Code of Regulations, title 11, section

1 999.9.2, subdivision (b). This includes every notice of action, regardless  
2 of the outcome and all documents reflecting the resolution of the action.

3 “An adverse action by a governmental entity includes, but is not  
4 limited to, suspension, revocation or denial of registration, civil or  
5 criminal judgment, assessment of a fine, administrative or civil  
6 penalty, entry of assurance of voluntary compliance or enforceable  
7 settlement agreement or an equivalent action regardless of its title.”

- 8 c. Provide all documentation related to every complaint and request for  
9 refund;
- 10 d. Provide an accounting of all funds received and disbursed related to the  
11 fundraising for the following fundraising campaigns, include all  
12 supporting documents:
- 13 i. Fundraising for Luna;
  - 14 ii. Fundraising for Rescuing Animals from the Woolsey Fire
  - 15 iii. Fundraising for “These Mamas Need Help”;
  - 16 iv. The Puppy Brunch;
  - 17 v. Fundraising for Cash;
  - 18 vi. Fundraising for Chia;
  - 19 vii. Fundraising for surgery for Tania;
  - 20 viii. Fundraising for Neema;
  - 21 ix. Fundraising for Silver/Coco;
- 22 e. For each of the above fundraising solicitations, provide all supporting  
23 documents, including but not limited to an accounting of the monies  
24 received and how these were spent, including receipts for services and goods  
25 purchased; a list of all donors, including contact information; copies of all  
26 solicitations sent or posted by any means on behalf of LITTLE LOVE  
27 RESCUE, or BRITTANY LITTLETON or their agents.
- 28 f. All documentation of all funds raised by LITTLE LOVE RESCUE,  
including copies of postings on social media, including copies of the  
solicitations from 2015 to the present;

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- g. An accounting of all funds received by LITTLE LOVE RESCUE and all funds spent by LITTLE LOVE RESCUE from 2015 to the present.
- h. A list of all financial institutions where funds raised by or on behalf of LITTLE LOVE RESCUE were deposited from 2014 to the present, this list must include account numbers and the institutions' addresses.
- i. All bank statements for any and all accounts where funds raised by or on behalf of LITTLE LOVE RESCUE were deposited, from 2014 to the present.
- j. Receipts or other documents which support or otherwise evidence proof of funds expended by or on behalf of LITTLE LOVE RESCUE.
- k. Copies of all statements or accountings from Venmo for funds raised for or on behalf of Little Love Rescue.
- l. Copies of all statements or accounting from GoFundMe for all funds raised for or on behalf of Little Love Rescue;
- m. Copies of all statements or accounting from PayPal for all funds raised for or on behalf of Little Love Rescue.

3. Payment of the \$58,000 penalty by LITTLE LOVE RESCUE is due within 30 days unless a timely written appeal of the assessment of penalty is received by the Attorney General. Payment shall be made payable to the California Attorney General.

4. All responses shall be sent to:

Sandra I. Barrientos, Deputy Attorney General  
California Department of Justice  
Office of the Attorney General  
300 South Spring Street, Suite 1702  
Los Angeles, CA 90013  
(213) 269-6551  
Sandra.barrientos@doj.ca.gov

5. Failure to comply with the terms of this order constitutes disobedience or resistance to a lawful order pursuant to Government Code section 11455.10. The Attorney



1 General may pursue a contempt sanction of violations pursuant to Government Code section  
2 11455.20, in addition to all other remedies available to the Attorney General.

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**RIGHT TO APPEAL/REQUEST FOR HEARING**

You have the opportunity to appeal this order and assessment of penalties by filing a written appeal and request for hearing within 30 calendar days of the date of this notice. Filing an appeal does not stay the effect of this order. The appeal procedures are found in California Code of Regulations, title 11, sections 999.6 through 999.8 and are available on the Attorney General's website at: [www.ag.ca.gov/charities/statutes.php](http://www.ag.ca.gov/charities/statutes.php).

Dated: July 21, 2020

Respectfully Submitted,



SANDRA I. BARRIENTOS  
Deputy Attorney General  
*Attorneys for DAVID ELLER, Registrar*

LA2020300170