

IN THE CIRCUIT COURT, SECOND
JUDICIAL CIRCUIT, IN AND FOR
LEON COUNTY, FLORIDA

CASE NO.: 2009 CA 3190

DIVISION:

ALLIED VETERANS OF THE
WORLD, INC., AND AFFILIATES,
a Florida non-profit corporation,

Plaintiff,

vs.

STATE OF FLORIDA,

Defendant.

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CLERK OF THE COURT
LEON COUNTY, FLORIDA

2009 MAR 19 AM 11:22

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COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

Plaintiff ALLIED VETERANS OF THE WORLD, INC., AND AFFILIATES, a Florida non-profit corporation ("Allied Veterans") sues Defendant the STATE OF FLORIDA (the "State") and says:

Jurisdiction

1. The Court has jurisdiction over this action pursuant to Chapter 86, Florida Statutes, in particular sections 86.011, 86.021, and 86.061.

Venue

2. Venue for this action against the State of Florida lies in Leon County, Florida.



Allegations Common to Both Counts

3. Plaintiff Allied Veterans is a Florida non-profit corporation which maintains its headquarters in Hendersonville, North Carolina.

4. Plaintiff Allied Veterans maintains numerous affiliates through out the State of Florida.

5. Allied Veterans was formed in Florida in 1979 to promote veterans' causes. Its primary mission is to assist veterans' health care by advocacy of the need for better healthcare for our veterans and by raising funds and making donations to veterans' healthcare facilities. A recent newsletter is attached hereto as Exhibit "A."

6. Allied Veterans is a veterans organization which is exempt from Federal income taxation pursuant to 26 U.S.C. § 501(c)(19) and has a current determination letter from the Internal Revenue Service.

7. Prior to May 26, 2008 Allied Veterans maintained a fundraising center in the form of an internet café or internet center located at 2636 Bayshore Boulevard, Dunedin, Florida. This fundraising location was operated pursuant to § 849.0935, § 849.094, Chapter 496, Florida Statutes, and other applicable law.

8. The State, through its officers and agents including particularly its law enforcement personnel, is charged with the enforcement and application of Florida law as it directly affects Allied Veterans. Allied Veterans asserts the unconstitutional application and

enforcement of Florida law by the State. Accordingly, the State has, or may, claim an interest which would be affected by the declaration and injunction sought herein.

9. On or about May 26, 2008 the officers and agents of the Pinellas County Sheriff's Department seized all of the personal property and assets at that location and arrested an agent of Allied Veterans' contractor based upon an unfounded suspicion of a violation of Florida's gambling laws and thus forcibly closed the location. The criminal statutes alleged to have been violated were § 849.01 (keeping a gambling house) and § 849.15 (possession of a coin operated device), Florida Statutes.

10. Prior to May 23, 2009 Allied Veterans maintained a fundraising center in the form of an internet café or internet center located at 4723 Highway 90, Marianna, Jackson County, Florida. This fundraising location was operated pursuant to § 849.0935, § 849.094, Chapter 496, Florida Statutes, and other applicable law.

11. On or about May 23, 2009 the officers and agents of the Jackson County Sheriff's Department seized all of the personal property and assets at that location based upon an unfounded suspicion of a violation of Florida's gambling laws and thus forcibly closed the location.

12. Prior to July 24, 2009 Allied Veterans maintained a fundraising center in the form of an internet café or internet center located at 624 South Pine Avenue, Ocala, Marion County, Florida. This fundraising location was operated pursuant to § 849.0935, § 849.094, Chapter 496, Florida Statutes, and other applicable law.

13. On or about July 23, 2009 the officers and agents of the Marion County Sheriff's Department visited this Allied Veterans' location and advised the manager on duty that the failure to close the location immediately would result in the arrest of all persons associated with the operation and the seizure of the personal property and assets at that location based upon an unfounded suspicion of a violation of Florida's gambling laws and thus forcibly closed the location.

14. Plaintiff Allied Veterans believes that its fundraising project, as hereinafter described, is legal and fully compliant with all applicable Florida law.

15. Law enforcement of the counties listed above, as agents of the State of Florida, have evidently taken the position that the fundraising operation by Allied Veterans does not comply with applicable Florida law.

16. State law enforcement officials are violating the state and federal constitutional rights of Allied Veterans in connection with their misinterpretation and misapplication of Florida law under the guise of enforcement. Not only is the State limiting the right of Allied Veterans to solicit funds for the advocacy of veterans' causes and to financially respond to the need for those causes, it is depriving Allied Veterans of liberty and property by imposing criminal sanctions of arrest and seizure on its legitimate activities. Moreover, the State is applying the gambling laws in a discriminatory way by not treating entities that are similarly situated the same. There are a substantial number of entities that utilize sweepstakes promotions in the State of Florida. While others are allowed to operate Allied

Veterans faces the risk of arrest and seizure despite the fact that its sweepstakes is materially identical.

17. Allied Veterans currently has fundraising affiliate locations in Alachua County, Brevard County, Columbia County, Duval County, Flagler County, Hernando County, Indian River County, Lake County, Nassau County, St. Johns County, St. Lucie County, Sarasota County, Seminole County, and Volusia County. However, should state law enforcement in these counties misconstrue and misapply the law as in Pinellas, Jackson, and Marion Counties, Allied Veterans' fundraising would be effectively terminated in such counties.

18. Allied Veterans faces piecemeal interpretation and application of Florida law that relates to its fundraising operations in each county in which it maintains an Affiliate. To avoid inconsistent results, promote judicial economy and clarify the interpretation and application of Florida law a single proceeding is appropriate.

Facts

19. Allied Veterans has complied with all applicable provisions of Chapter 496, Florida Statutes and is authorized to conduct fundraising in the State of Florida.

20. Prior to May 26, 2008 Allied Veterans conducted a fundraising project from its location at 2636 Bayshore Boulevard in Dunedin, Florida to fund its mission and programs as charitable and civic fundraising.

21. Prior to May 23, 2009 Allied Veterans conducted a fundraising project from its location at 4723 Highway 90 in Marianna, Florida to fund its mission and programs as charitable and civic fundraising.

22. Prior to July 23, 2009 Allied Veterans conducted a fundraising project from its location at 624 South Pine Avenue, Ocala, Marion County, Florida to fund its mission and programs as charitable and civic fundraising.

23. At the above locations Allied Veterans hosted the operation of what were essentially internet café or internet centers.

24. At the above locations, Allied Veterans sold internet access time, or cybertime, to be used on computers which were made available to its patrons.

25. Internet access time was made available to patrons at a competitive and fair market rate of 20¢ per minute. In addition, other services such as copying, printing, faxing, and home dial-up internet were available. A copy of the list of services at the Allied Veterans location is attached hereto as Exhibit "B." When the customer approached the service counter to purchase services he would also receive a verbal description of how internet access time and other services were made available.

26. Patrons that chose to purchase internet access time would be handed a card, similar to a credit card, containing a magnetic strip onto which a unique customer account number would be electronically encoded. This customer account number would access the customer's account information which was stored on a central server at the location. Upon

purchase of internet access time the customer's account would be credited with the number of minutes purchased. For example, if the customer sought to purchase \$10.00 worth of internet access time the computer would electronically inform the database that the customer had available fifty (50) minutes of internet access time that could be used.

27. At the same time, the computer would electronically assign a given number of entries into the free promotional sweepstakes utilized by Allied Veterans to that customer's account. As a promotion to encourage the sale of internet access time, the number of entries electronically assigned to the customer's account would be based on the number of internet access minutes purchased. Similar to McDonald's, the more orders of french fries that are purchased the more chances to win that are provided.

28. The sweepstakes entries assigned to the customer's account were drawn from a set, or finite, pool of entries. That pool of entries contained a precise number of entries that were not winners, a precise number of entries that won the first prize, a precise number of entries that won second prize, etc. In other words, the pool of entries is pre-defined.

29. The sweepstakes entries were provided to the customer free of charge. There was no consideration for the free sweepstakes entries. The customer received the consumer service purchased, internet access time, at a fair, competitive market rate. However, the customer also received free sweepstakes entries as a promotion or encouragement to purchase the service.

30. There was no purchase necessary to receive the free sweepstakes entries. Any member of the general public over eighteen (18) years of age could receive free sweepstakes entries upon request in person at the Allied Veterans location or by mailing a written request to the address identified in the rules.

31. All entries distributed upon request were drawn from the same finite pool of entries and thus had the same chances of winning a prize as those entries distributed in connection with the purchase of internet access time.

32. Before the customer was provided with an internet card he was asked to read and sign an entry form acknowledgment that he understood the sweepstakes promotion in order to participate. A copy of this entry form is attached hereto as Exhibit "C."

33. The cards with the magnetic strip could then be taken to any computer terminal at the internet center and swiped. Swiping the card electronically transmitted the customer's account number to the computer terminal as a shortcut to keying in a long account number. The computer terminal would then communicate with the central server to access the customer's account for both internet access time and free sweepstakes entries.

34. After swiping the card the patron then had several options. The patron could connect to the internet and begin using the internet access time that was purchased. A vast number of internet based programs, games and information was available. Alternatively, the patron could reveal the results of the sweepstakes entries.

35. There were several different methods and manners of revealing the sweepstakes entries. These methods included a “quick reveal” function which simply displayed the results of each entry without fanfare. Other methods of revealing the results of the entries included graphic icons and animation that included simulation of spinning wheels similar to a slot machine and game simulation. However, the desktop computers merely revealed the results of the entries, through graphic video display, they did not determine or affect the results in any way. Moreover, the choice of the method of revealing the entries did not affect the result.

36. When the customer sought to reveal one or more sweepstakes entries the computer would electronically draw the requested number of entries from the finite pool of entries that were available. The computer terminal would then reveal the results of the entries in the manner chosen by the customer. The method of drawing the entries from the finite pool remained the same regardless of the manner chosen by the customer to reveal the results on the video display monitor. Accordingly, the manner in which the entries were revealed played no role in the results achieved. Once the results of the entry are revealed to the customer that entry is removed from the pool of available entries.

37. The operation of the computer terminal does not entitle the user to receive anything of value nor does the computer dispense anything of value. The use of the computer terminal itself is irrelevant since it is not necessary for patrons to determine whether or not they have received a winning entry or for collection of any prize.

38. The individual computer terminals function only through a connection to the server. The magnetic cards themselves have no value but only serve as identification of the customer. The computer terminals do not function through the insertion of cash or anything of value. The computers do not dispense cash or anything of value. All prizes must be collected at the front desk.

39. There was no charge for revealing sweepstakes entries on the computers at the internet center. Internet access time that was purchased did not get reduced while the patron was revealing the results of the sweepstakes entries. Whether the customer chooses to participate in the sweepstakes or not, and regardless of whether the customer wins any prize in the sweepstakes or not, the customer always retains the internet services purchased.

40. After one or more entries of the sweepstakes were revealed electronically on the computer terminal the customer had the option of collecting any prize won, including any cash prize.

The Law

41. Section 849.01, Florida Statutes, makes it illegal to keep a gambling house in the State of Florida. This section provides:

849.01 Keeping gambling houses, etc. –

Whoever by herself or himself, her or his servant, clerk or agent, or in any other manner has, keeps, exercises or maintains a gaming table or room, or gaming implements or apparatus or house, booth, tent, shelter or other place for the purpose of gaming or gambling or in any place of which she or he may directly or indirectly have charge, control or management, either

exclusively or with others, procures, suffers or permits any person to play for money or other valuable thing at any game whatever whether heretofore prohibited or not, shall be guilty of a felony of the third degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084.

42. There is no statutory definition of gambling. However, case law is clear that there are three (3) essential elements for illegal gambling in the State of Florida: consideration, chance, and prize. Little River Theatre Corp. v. State, 135 Fla. 854, 185 So. 855 (Fla. 1939); Blackburn v. Ippolito, 156 So. 2d 550, 551 (Fla. 2d DCA 1953).

43. The State is unconstitutionally applying § 849.01, Florida Statutes, to the lawful fundraising activities of Allied Veterans.

44. Certain types of charitable fundraising and game promotion are statutorily recognized in the State of Florida by removing the element of consideration. Simply, if there is no consideration there is no illegal gambling in the State of Florida.

45. Section 849.0935, Florida Statutes, provides in pertinent part, as follows:

849.035 Charitable non-profit organizations; drawings by chance; required disclosures; unlawful acts and practices; penalties. -

(2) The provisions of s. 849.09 [against illegal lottery] shall not be construed to prohibit an organization qualified under 26 U.S.C.S. 501(c)(3), (4), (7), (8), (10), or (19) from conducting drawings by chance pursuant to the authority granted by this section provided the organization has complied with all applicable provisions of Chapter 496.

This statute, however, recognizes that there cannot be any pecuniary considerations for the drawings:

(4) It is unlawful for any organization which, pursuant to the authority granted by this section, promotes, operates or conducts a drawing by chance:

(b) To require an entry fee, donation, substantial consideration, payment, proof of purchase or contribution as a condition of entering the drawing or of being selected to win a prize. However, this provision shall not prohibit an organization from suggesting a minimum donation of or from including a statement of such suggested minimum donation on any printed material utilized in connection with the fundraising event or drawing;

46. Section 849.094, Florida Statutes, provides, in pertinent part, for game promotions so long as the issue of consideration is absent.

849.094 Game promotion in connection with sale of consumer products or services –

(a) "Game promotion" means, but is not limited to, a contest, game of chance or gift enterprise conducted within or throughout the state and other states in connection with the sale of consumer products or services, and in which the elements of chance and prize are present.

(2) It is unlawful for any operator:

(e) To require an entry fee, payment or proof of purchase as a condition of entering a game promotion.

47. Section 849.094, Florida Statutes, further provides for the filing of an application with the Department of Agriculture and Consumer Services, a bond or trust account, and other requirements. However, these requirements are inapplicable to non-profit organizations. See, § 849.094(10), Florida Statutes.

48. Florida law clearly permits game promotions in connection with the sale of consumer services and for tax exempt organizations to conduct fundraising via drawings by chance so long as there is no purchase, donation, or contribution necessary to participate by receiving a chance to win.

49. The solicitation of funds by a non-profit organization is recognized as constitutionally protected free speech. The communications by the organization in connection with the solicitation of funds to promote its purpose or mission are intertwined with the fundraising itself. Thus, when an organization is conducting fundraising it is simultaneously communicating the reasons for the need for the contributions. The misinterpretation and misapplication of Florida law by state law enforcement officials unconstitutionally infringes on Allied Veterans' constitutional rights.

50. Section 849.15, Florida Statutes, prohibits slot machines in the State of Florida.

This statute provides, in pertinent part:

849.15 Manufacture, sale, possession, etc., of coin-operated devices prohibited. –

(1) It is unlawful:

(a) to manufacture, own, store, keep, possess, sell, rent, lease, let on shares, lend or give away, transport or expose for sale or lease or to offer to sell, rent, lease, let on shares, lend or give away, or permit the operation of, or for any person to permit to be placed, maintained, or used or kept in any room, space, or building owned, leased or occupied by the person or under the person's management or control, any slot machine or device or any part thereof;

Section 849.16, Florida Statutes, defines a slot machine as follows:

849.16 Machines or devices which come within provisions of law defined. –

(1) Any machine or device is a slot machine or device within the provisions of this chapter if it is one that is adapted for use in such a way that, as a result of the insertion of any piece of money, coin, or other object such machine or device is caused to operate or may be operated and if the user, by reason of any element of chance or of any other outcome of such operation unpredictable by him or her, may:

(a) Receive or become entitled to receive any piece of money, credit, allowance or thing of value, or any check, slug, token, or memorandum, whether of value or otherwise, which may be exchanged for any money, credit, allowance, or thing of value or which may be given in trade; or

(b) Secure additional chances or rights to use such machine, apparatus, or device even though it may, in addition to any element of chance or unpredictable outcome of such operation, also sell, deliver, or present some merchandise, indication of weight, entertainment, or other thing of value.

51. The State is unconstitutionally applying the slot machine statutes referenced above to standard desktop personal computers that are utilized for internet access by Allied Veterans' patrons.

52. The misinterpretation and misapplication of law to the activities of Allied Veterans results in an unconstitutional search and seizure. On two (2) occasions thus far state law enforcement has illegally seized property utilized by Allied Veterans for its charitable fundraising. A correct interpretation and application of Florida law would prevent such constitutional actions in the future.

53. All conditions precedent to the institution of this action have occurred, have been performed, or have been waived.

Count I
(Declaratory Action)

54. The allegations of paragraphs 1 through 53 are incorporated by reference and made a part hereof as if fully set forth herein.

55. This is an action for declaratory relief pursuant to Chapter 86, Florida Statutes. A genuine and actual dispute exists between the parties as to the legality of Allied Veterans' operation as described above.

56. Allied Veterans contends that its operation complied with all applicable Florida law. The State, however, through one or more of its counties, have taken the position that the Allied Veterans' operations were in violation of Florida Statutes relating to gambling or the

possession and/or operation of gambling devices. As a result the State has forced the closure of several of Allied Veterans' internet centers.

57. Allied Veterans asserts that the operation described above meets all the requirements of Florida law for the following reasons:

- a. There was no consideration charged for the free sweepstakes entries;
- b. Allied Veterans is qualified under 26 U.S.C. § 501(c)(19) as a tax exempt veterans organization;
- c. Allied Veterans has complied with all applicable provisions of Chapter 496, Florida Statutes;
- d. Allied Veterans did not require an entry fee, donation, substantial consideration, payment, proof of purchase, or contribution as a condition of entering the sweepstakes or being selected to win a prize;
- e. Allied Veterans provided free sweepstakes entries upon request in person at its location;
- f. Allied Veterans provided free sweepstakes entries upon written request by mail;
- g. The entries provided without the purchase of internet access time had the same chance of winning as the entries provided in connection with the sale of internet access time;

- h. Allied Veterans sold internet access time on computers that it provided at a fair, competitive market rate;
- i. Any internet access time purchased was not reduced by revealing sweepstakes entries;
- j. The sweepstakes entries were drawn from a randomly shuffled finite pool of entries;
- k. The desktop computers did not select the entries nor affect the results of the entries;
- l. The method or number of entries revealed at one time did not affect the results of the sweepstakes entries;
- m. All prizes were awarded;
- n. No entry was arbitrarily removed, disqualified, disallowed, or rejected;
- o. No literature or advertising material used in connection with the operation was false, deceptive, or misleading;
- p. The sweepstakes was not manipulated or rigged so as to allocate a winning game or any portion thereof to certain lessees, agents, or franchisees;
- q. The sweepstakes was not manipulated or rigged so as to allocate a winning game or a part thereof to a particular period of the game promotion or to a particular geographic area; and

r. All winners were promptly notified.

58. As a result of the position taken by state law enforcement Allied Veterans is in doubt as to its legal rights in connection with the fundraising operation described herein.

59. The State has impaired the right of Allied Veterans to engage in lawful conduct and the continued threat to engage in such lawful conduct exists.

60. The State's unconstitutional application of its gambling laws is depriving Allied Veterans of its rights of free speech, including the solicitation of funds in connection with its advocacy for veterans' issues, liberty, and property. Moreover, it allows those less favorably situated, having only a commercial or business interest, to engage in promotional sweepstakes while denying that right to Allied Veterans even though not necessary to protect a compelling governmental interest.

WHEREFORE, Plaintiff Allied Veterans seeks declaratory judgment declaring that it is lawfully operating and conducting lawful fundraising pursuant to all applicable Florida law and providing for such other and further relief as this Court may deem just, proper, and equitable in the premises including supplemental relief.

Count II
(Injunctive Relief)

61. The allegations of paragraphs 1 through 53, 57 and 60 are incorporated by reference and made a part hereof as if fully set forth herein.

62. This is an action for temporary and permanent injunctive relief.

63. The arrest of a manager of the operation and management company, the threat of criminal prosecution and seizure of all of the equipment necessary to conduct Allied

Veterans' fundraising caused irreparable harm and injury as it was prevented from conducting fundraising in accordance with applicable Florida law. Moreover, Allied Veterans is under threat of prosecution of violation of criminal law as a result of the operation of its legitimate and lawful business thereby effectively preventing Allied Veterans from conducting this manner of fundraising in the future.

64. The closure of its operation and threat of prosecution cannot be remedied by money damages and thus constitutes irreparable injury.

65. Allied Veterans has no adequate remedy at law if its fundraising operation is forced to remain closed, it is subject to criminal prosecution and the equipment utilized for fundraising is retained.

66. Allied Veterans seeks to enjoin the State interfering with its operation as described herein.

67. There is a substantial likelihood of success on the merits of this action as Allied Veterans believes that it can readily demonstrate that the operation in question does not violate any laws of the State of Florida but, rather, falls within the protections of § 849.0935, § 849.094, Florida Statutes, and other applicable Florida law.

WHEREFORE, Allied Veterans seeks a temporary and permanent injunction against the State restraining, enjoining, and prohibiting the State from interfering or impeding Allied Veterans from the valid and lawful operation of its fundraising method as described above and for such other relief as this Court deems appropriate, just, and equitable.

DATED this 18th day of August, 2009.

MATHIS & MURPHY, P.A.


By: _____

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Attorney for Plaintiff Allied Veterans of
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Veterans HELPING Veterans



Allied Veterans of the World, Inc. & Affiliates is always shying away from glory. Allied Veterans prides itself on being simply veterans helping veterans, defending the promise that is America. Since 1976, even after their military service, Allied Veterans still hears the call to duty, and they act on that conviction. They've been serving their fellow countrymen and women ever since, donating time, effort and money to veteran healthcare and first responder organizations.

They're here for veterans in need, and proudly serve them primarily through contributions to Veterans Administration hospitals and clinics. They raise funds through bingo, car washes, internet centers, and cookouts.

Along with Allied Veterans' tireless fundraising projects come stories of community support and enrichment. Allied Veterans assists the dedicated VA volunteers and medical professionals with funds that help them better serve our ailing veterans. In the past year alone, Allied Veterans of the World, Inc. & Affiliates presented **more than \$2.8 million to veteran and first responder organizations**. But, there's much more to do. In the words of Senior Vice Commander Jerry Bass: **"We're a small but persistent Veterans organization that works tirelessly toward achieving one goal and one goal only: improving the state of healthcare for our American heroes."**

For more information, visit our website,
www.AlliedVeteransInc.com.

Please continue to support our troops and God bless America!



Examples of Veterans Helping Veterans:

Florida High School JROTC Scholarship Program	\$ 442,000
Gainesville VA Hospital	\$ 125,000
Orlando VA Hospital	\$ 125,000
Gulf Port Veterans Medical Center	\$ 125,000
AMVETS National Headquarters	\$ 125,000
Florida Dept. of Veterans Affairs	\$ 100,000
Jacksonville USO	\$ 100,000
North Carolina VA Hospitals	\$ 100,000
Bay Pines Veterans Medical Center	\$ 90,000
Bay Pines VA Healthcare System	\$ 50,000
Groundbreaking for VA Hospital	\$ 40,000
Yulee Lions Club	\$ 31,500
Veterans Memorial Garden	\$ 30,000
Jacksonville FOP Foundation	\$ 30,000
Orlando/Brevard Co. VA Medical Centers ..	\$ 30,000
VAVS James H. Parke Memorial Fund	\$ 30,000
Texas Hurricane Victims	\$ 27,792
Duval County Food Bank	\$ 25,000
Justice Coalition	\$ 20,000
Orlando VA Medical Center Nursing Home ..	\$ 20,000
WJCT Public TV Sponsor of "Carrier"	\$ 20,000
Marianna VA Medical Center	\$ 18,329
St. Augustine Homeless Coalition	\$ 15,000
Fraternal Order of Police	\$ 14,000
Project Little Feet - Jacksonville, Florida ...	\$ 10,000
St. Augustine Veterans Memorial Fund	\$ 10,000
Columbia Co. Crime Prevention Program ..	\$ 10,000

More than \$2.8 million donated to veteran & first responder organizations since December 2007.



Allied Veterans Concurs with Congress: Improve Vet Healthcare

Allied Veterans of the World, Inc. & Affiliates supports Congress' efforts to pass legislation that improves benefits for America's servicemen and women. It's important to recognize our heroes and the American people should provide assistance to meet the needs of those who have and are currently serving our country.

On April 21, Allied Veterans Senior Vice Commander Jerry Bass testified at a U.S. House of Representatives subcommittee hearing regarding his views on veteran healthcare.

Following is an excerpt from Jerry's testimony to Congress: "...we all recognize the need for vast improvement in our veteran healthcare system... please proceed with due respect for our Veterans' steadfast dedication to our country – dedication to our children's country – and their unrelenting sacrifice to uphold our country's freedoms. I believe it's our duty to give back to those who have sacrificed so much. Our veterans continue to unite America's heart and soul. Please continue to unite America's heart and soul. Please continue to protect the healthcare of our country's heroes just as they've dedicated their lives to protect our country and its freedoms. Please stand up on behalf of veterans, and honor their sacrifice by continuing to improve veterans' healthcare...God bless you."

For up-to-date information regarding legislation, other veteran news and Allied Veteran presentations, visit www.AlliedVeteransInc.com.

A message for our current active duty men and women of the United States Military:

Your extraordinary sacrifice hasn't gone unnoticed by this humble veterans organization... Good luck – you'll continue to be in our thoughts and prayers. Most importantly, thank you for your dedication to our country – we continue to be deeply grateful and proud.

—Land of the Free...Because of the Brave—



Allied Veterans of the World, Inc. & Affiliates

MEMBERS OF VETERANS ADMINISTRATION, V.A.V.S.

P.O. Box 633 • Callahan, FL 32011

www.AlliedVeteransInc.com

Allied Veterans of the World Affiliate ____
Hot Spot Business Center
Products & Services

Prepaid Internet & Computer Terminals

Services we offer:

- | | |
|---|---|
| ❖ Full Internet Access | ❖ Internet Phone Use (select locations) |
| ❖ Google docs (similar to Microsoft Word & Excel) | ❖ E-mail |
| ❖ On-line Fun Games | ❖ IIT Home Dial-up Internet |

Pricing

- | | |
|-----------------------------|--------------------------------|
| ❖ Prepaid Internet | \$ 0.20 / min |
| ❖ Printing | Free w/ internet time purchase |
| ❖ Copying | Free w/ internet time purchase |
| ❖ Faxing | Free w/ internet time purchase |
| ❖ IIT Home Dial-Up Internet | \$5.00 unlimited 1 month |

(Must ask attendant for installation CD)

If you have purchased \$5 of Prepaid Internet & Computer usage you will receive unlimited IIT Dial-Up Internet access for your home for one month. To use this service, on the back of your IIT Prepaid Internet card is your User name & Password.

Your IIT User name & Password is the 22 digit code on the back of your IIT prepaid internet card. The first 11 digits are the Username & the last 11 digits are the Password.

Further technical support and instructions are available on the installation CD.

No purchase necessary for sweepstakes.

** See sweepstakes poster or computer terminal for complete set of rules.

For additional information on Allied Veterans of the World, go to www.alliedveteransinc.com

ENTRY FORM

Please read and sign in order to participate in the Allied Veterans Cyber Center Sweepstakes:

1. I understand that I am purchasing prepaid internet access time.
2. I understand there is no purchase necessary to enter the promotional sweepstakes.
3. I am not gambling.
4. I cannot purchase sweepstakes entries. I understand I receive free entries with the purchase of internet time or I can request a maximum of 100 free entries per day by reading the sweepstakes rules and mailing in a request for my entries.
5. I am at least 18 years of age.
6. I understand that the sweepstakes entries are selected from a fixed pool of total entries at the time the internet access time is purchased. Entries that have been drawn prior to mine are no longer available at the time my entries are drawn and may limit the prizes available.
7. Sweepstakes entries will be provided to me electronically and a computer is necessary to draw my entries and reveal the results of those entries. A complete copy of the rules and regulations are posted and available on request. The source of all prize money is from internet access time sales.

I agree to the above:

Print Name

Address

Signature

Date

Description of the Cyber Center

We sell prepaid internet access time which gives you full access to the internet as well as use of Google Docs which is similar to Microsoft Word and Excel as well as other free programs. It also allows you to access online free fun games, e-mail, surf the web, research, or access the unlimited number of things available on the internet. Upon request you can receive a CD for home dial up service with your purchase of prepaid internet time. We also offer copy, print and faxing services.

Sponsored by: Allied Veterans of the World and Affiliates
Hendersonville, NC

EXHIBIT "C"