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Attorney General Tom Corbett  
Office of the Attorney General  
Commonwealth of Pennsylvania  
Charitable Trusts and Organizations Section  
21 South 12th Street, 3rd Floor  
Philadelphia, PA 19107

**Re: Operation Good Neighbor Foundation**

Dear Attorney General Corbett:

I am writing to you as a citizen, a taxpayer, and a president of a charitable organization. Today, like many Pennsylvanians, I learned of the investigative report published in the *American Prospect* and summarized in the *Philadelphia Daily News* regarding Operation Good Neighbor Foundation. I am deeply disturbed by several of the facts revealed in this report.

First, based on the information presented in the report, the charity that Senator Rick Santorum founded in 2001 and continues to lead, Operation Good Neighbor Foundation, appears to be in violation of Pennsylvania law. The report recites evidence of a failure by Operation Good Neighbor Foundation to comply with Pennsylvania's charitable registration requirements. As you know, by statute and implementing Department of State regulations, a charity is required to register if it solicits more than \$25,000 within the Commonwealth during a calendar year. According to today's report, records of the Foundation for 2002 indicate that it raised at least \$94,000 from Pennsylvania sources during that year, but Department of State officials have publicly stated that they cannot locate any record of registration for the Foundation. If this information is confirmed, the Foundation has violated Pennsylvania law. I therefore urge you to begin an investigation of the Foundation's compliance with Pennsylvania registration requirements for charitable organizations.

Second, the report summarizes the publicly-available federal tax returns for the Foundation for the years 2001-2003. Analysis of these tax returns shows that the Foundation disbursed just 35.9% of the charitable funds it raised on actual charitable grants. The bulk of the funds raised, 56.5%, was spent on salaries, fundraising, travel, conference costs, and rent. This low level of actual charitable grant-making, and the high level of overhead, is extraordinary for a legitimate charitable organization which does not provide direct services to the community.

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Third, the report notes the connection between Operation Good Neighbor and the Santorum election campaign. According to the report, the Executive Director of the Foundation, Robert G. Bickhart, was paid \$50,000 in salary in that capacity during 2002-03. Mr. Bickhart also serves as the finance manager of the Senator's election campaign.

Fourth, Mr. Bickhart's business, Capitol Resource Group, which describes itself on its website as a "government affairs consortium," i.e. a lobbying firm, is based in the same office suite as the Foundation (One Tower Bridge, Suite 1440, West Conshohocken). Senator Santorum's election campaign also is headquartered in the same office suite. In other words, it appears that the Foundation has paid "rent" either to Capitol Resource Group, or to the Senator's campaign, or both.

In light of the serious questions raised by today's revelations, I write on behalf of all Pennsylvanians to urge in the strongest terms that the Charitable Trusts and Organizations Section investigate Operation Good Neighbor Foundation – its compliance with Pennsylvania law, its ties to the Santorum campaign and Mr. Bickhart and his lobbying firm, and the nature of its non-charitable expenditures. I applaud the charitable work that Operation Good Neighbor supports with some of the funds it raises. But I am deeply troubled by its disproportionate and irregular overhead costs. In these times when citizens act with utmost generosity to assist charitable organizations in meeting serious human needs in our communities, we must not allow Pennsylvania charitable organization law to be flouted or exploited for ventures which either are not truly charitable or which use charitable contributions improperly. Pennsylvanians expect the Attorney General to safeguard the integrity of charitable organizations soliciting funds in our Commonwealth, so I encourage you to promptly commence a vigorous and comprehensive investigation of Operation Good Neighbor Foundation. If I can assist in your investigation in any way, please contact me.

Sincerely,

  
Alan Sandals