

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF ERIE

-----X

PEOPLE OF THE STATE OF NEW YORK, by  
ERIC T. SCHNEIDERMAN, Attorney General of the  
State of New York,

Petitioner,

**VERIFIED  
PETITION**

-against-

Index No.

CHRISTINA SANFORD GORDON DBA  
CS CONSULTING

Respondent.

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Petitioner, the People of the State of New York, by their attorney, Eric T.

Schneiderman, Attorney General of the State of New York, alleges upon information and belief:

**INTRODUCTION**

1. Petitioner brings this special proceeding to enjoin Respondent, a predator who has stolen tens of thousands of dollars from churches, community-based organizations and others. Respondent represents that she is a fundraiser who will apply for, and obtain grants on behalf of her victims for which she takes their money. In fact, Respondent never applied for or obtained any grants, and spent the money she took from her victims for her own personal expenses and extravagances, including cruises, jewelry, furs, airline tickets, clothes, lingerie, manicures and the like.

**JURISDICTION AND PARTIES**

2. Petitioner ("NYAG") brings this special proceeding pursuant to N.Y. Executive Law ("Executive Law") § 63(12) to enjoin Respondent's fraudulent business practices. Petitioner also seeks, *inter alia*, restitution on behalf of Respondent's victims, and costs, as

authorized by statute, to be paid to the State of New York.

3. Executive Law § 63(12) empowers the Attorney General to seek restitution, injunctive relief and damages when any person or business entity has engaged in repeated fraudulent or illegal acts, or has otherwise demonstrated persistent fraud or illegality in the carrying on, conducting or transaction of business.

4. Petitioner is the People of the State of New York by their attorney Eric T. Schneiderman, Attorney General of the State of New York.

5. Respondent Christina Sanford Gordon does business as CS Consulting and resides at 469 Koons Avenue, Buffalo, New York 14211.

## **FACTS**

### **Grants Gateway**

6. Respondent holds herself out as a fundraiser who can identify, apply for, and obtain grants from New York State agencies through the New York Grants Gateway.

7. The New York Grants Gateway ("Grants Gateway") is a unified system for New York State agencies to post available grant opportunities, and for applicants to find and apply for grants from State agencies.

8. Most New York State agencies that make grants participate in the Grants Gateway system, and many use it as a means to apply for grant opportunities.

9. Potential applicants who wish to apply for grants through the Grants Gateway must first register for the system on a form called the New York Grants Gateway Registration Form for Administrator ("Gateway Registration Form"). To register, an applicant must mail a paper Gateway Registration Form to the Grants Gateway. This form must be notarized and must include an organization chart of the applicant.

10. The application form requires an organization to name two administrators who are responsible for creating and managing the organization's authorized users of Grants Gateway. Authorized users are able to submit documents to the Grants Gateway document vault. The head of the organization must designate the administrators.

11. Each applicant organization must be registered with the NYS Statewide Financial System ("NYSSFS") to register with Grants Gateway.

12. Once the application is received and processed, one of the designated administrators must complete an online form providing detailed information about the applicant organization.

13. Before any non-profit entity can be considered for a grant, it must become prequalified.

14. The prequalification process requires an applicant to complete a series of online forms and upload a number of documents to the Grants Gateway document vault. The goal of the prequalification process is to assess the organization's compliance, capacity and integrity. Nonprofits must also submit corporate organization documents, tax documents, and audit review, a CHAR500 (Annual Filing Form) or CHAR410 (Registration Statement), board of directors profile, bylaw and the resumes of senior leadership.

15. Each applicant must select the New York State agency from which it is likely to seek the most grant opportunities. Once an applicant submits its document vault, a prequalification specialist from the designated state agency reviews the materials.

16. A non-profit organization must renew its prequalification each year or it will expire. The renewal process requires uploading the current year's documents, such as audit statements and tax forms, to the document vault.

17. Once an entity is prequalified, it can be considered for specific grant

opportunities through the Grants Gateway.

18. There are no fees to register with or apply for grants through the Grants Gateway.

19. Once an organization submits its application for a grant to an agency, the agency reviews and scores the application.

20. If the organization is awarded a grant, the awarding agency handles notification of the award and any subsequent contract negotiations related thereto.

**Respondents Fraudulent Representations to Churches, Community-Based Organizations and Others**

21. Respondent represents herself to churches, community-based organizations, and others as an expert fundraiser with years of experience with the Grants Gateway, and a very close relationship with a person named "Sylvia Gregory," who she represents works for the Grants Gateway.

22. Christina Sanford is listed as the Grantee Delegated Administrator on the Gateway Registration Form for the following entities:

- a. 240 Kensington Avenue,
- b. Black Achievers Inc,
- c. Brundige Development Corporation,
- d. Come-N-Unity Inc.,
- e. DDJ Car Wash & Detail, Inc.,
- f. Elim Christian Fellowship, Inc.,
- g. Elim Community Corporation,
- h. Elim Community Development Corporation Of Buffalo,
- i. Jrow Catering Enterprises Inc,
- j. Nas Quick Sign, Inc.,
- k. Nehemiah Community Development Corp.,
- l. Reach, Inc.,
- m. The Cross, Inc.,
- n. The Miracle Christian Fellowship Center, Inc.,
- o. T-N-T Rental Properties,
- p. Tre & Associates Inc.,
- q. True Bethel Baptist Church Inc, and
- r. True Community Development Corp.

23. Respondent misrepresented to some, or all of these entities that she had identified, applied for, and successfully obtained grants for the entities through the Grants Gateway.

24. To bolster her misrepresentations, Respondent created a fictitious person named "Sylvia Gregory," who she said worked for the Grants Gateway. "Sylvia Gregory" regularly emailed some or all of these entities to (i) congratulate them on being awarded a grant, (ii) extol the virtues and effectiveness of Respondent, (iii) explain what steps are needed to be taken to have the grants paid to them, and (iv) to explain the delay in the receipt of grant funding.

25. Respondent took from the entities tens of thousands of dollars in consulting and application fees.

26. In one case, a local church incurred \$345,000 in liabilities for capital improvements it undertook based on Respondent's representation that she had secured grants for it.

27. In another case, a local church had its roof ripped off and only partially reinstalled, leaving the church at the mercy of the Western New York weather. The church, which has only about 100 members, does not have the funds to complete the project.

28. None of the above-listed entities received a grant through the Grants Gateway.

29. Respondent did not submit a grant application for any of the entities.

30. No one named Sylvia Gregory is employed at the Grants Gateway.

**CAUSE OF ACTION  
PURSUANT TO EXECUTIVE LAW § 63(12):  
FRAUD**

31. Respondent has repeatedly and persistently engaged in fraud in the operation of her consulting business.

32. Respondent's conduct constitutes repeated and persistent fraud in violation of Executive Law § 63(12).

WHEREFORE, Petitioner demands an order and judgment against Respondent as follows:

(a) permanently enjoining Respondent from engaging in the fraudulent acts and practices alleged herein;

(b) directing Respondent to provide Petitioner with a full accounting of all payments she has received from any third party from January 1, 2016 to date;

(c) granting full restitution to all injured persons and entities;

(d) enjoining the Respondent, including any entity in which she has a legal or beneficial interest, from engaging in any business activity unless she first posts a bond in the amount of \$1,000,000 by a surety or bonding company licensed by, and in good standing with, the New York State Department of Insurance as a condition of accepting advance payments;

(e) pursuant to CPLR § 8303(a)(6), granting costs to the State of New York in the amount of \$2,000; and

(f) for such other and further relief as the court deems just and proper.

Dated: Buffalo, New York  
February 26, 2018

ERIC T. SCHNEIDERMAN  
Attorney General of the State of New York  
JAMES M. MORRISSEY  
Assistant Attorney General  
350 Main Street, Suite 300A  
Buffalo, NY 14202  
(716) 853-8471

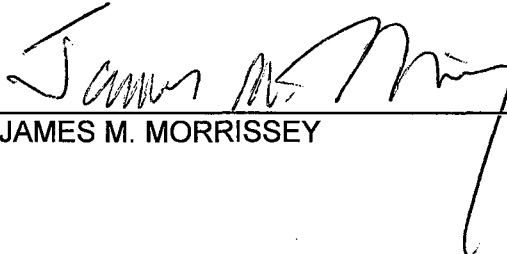
VERIFICATION

STATE OF NEW YORK )  
COUNTY OF ERIE ) ss.:

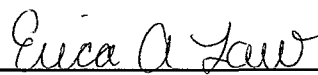
JAMES M. MORRISSEY, being duly sworn, deposes and says: He is an Assistant Attorney General in the office of Eric T. Schneiderman, Attorney General of the State of New York, and is duly authorized to make this verification.

He has read the foregoing petition and knows the contents thereof, and the same is true to his own knowledge, except as to matters therein stated to be alleged on information and belief, and as to those matters he believes them to be true.

The reason this verification is not made by petitioners is that petitioners are a body politic. The Attorney General is their statutory representative.

  
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JAMES M. MORRISSEY

Sworn to before me this  
26<sup>th</sup> day of February, 2018.

  
\_\_\_\_\_  
Notary Public

ERICA ANNE LAW  
NOTARY PUBLIC, STATE OF NEW YORK  
Registration No. 01LA6367380  
Qualified in Erie County  
Commission Expires November 20, 2021