

1 WILLARD K. TOM
General Counsel
2 ROBERT J. SCHROEDER
Regional Director

3 MIRY KIM, WA State Bar No. 31456
4 LAURA M. SOLIS, WA State Bar No. 36005
Federal Trade Commission
5 915 Second Avenue, Suite 2896
Seattle, WA 98174
6 Phone: (206) 220-6350
Facsimile: (206) 220-6366
7 email: mkim@ftc.gov
lsolis@ftc.gov

8 ATTORNEYS FOR PLAINTIFF
9 FEDERAL TRADE COMMISSION

<input checked="" type="checkbox"/> FILED	<input type="checkbox"/> RECEIVED
<input type="checkbox"/> ENTERED	<input type="checkbox"/> SERVED ON
COUNSEL/PARTIES OF RECORD	
<div style="border: 1px solid black; padding: 5px; width: fit-content; margin: 0 auto;"> <p>JAN 26 2011</p> </div>	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

10
11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13
14 **FEDERAL TRADE COMMISSION**

15 Plaintiff,

16 v.

17 **IMMIGRATION CENTER, a Colorado Non-**
18 **Profit Corporation;**

19 **IMMIGRATION FORMS AND**
20 **PUBLICATIONS, INC., a Missouri**
corporation;

21 **CHARLES DOUCETTE, individually and**
22 **d/b/a TELESTAFFING, IMMIGRATION**
FORMS AND SERVICES, and
IMMIGRATION FORM PROCESSING;

23 **DEBORAH STILSON a/k/a DEBORAH**
24 **MALMSTROM, individually and d/b/a**
LIBERTY LEGAL SERVICES, AMERICAN
25 **LEGAL SERVICES, and NINNER;**

26 **ALFRED BOYCE, individually and d/b/a**
MAYDENE WEB SERVICES;

3:11-cv-00055

Civil Action No.

**COMPLAINT FOR PERMANENT
INJUNCTION AND OTHER
EQUITABLE RELIEF**

1 THOMAS STRAWBRIDGE, individually
2 and as an officer of IMMIGRATION FORMS
AND PUBLICATIONS, INC.;

3 ROBIN MEREDITH, individually and as an
4 officer of IMMIGRATION FORMS AND
PUBLICATIONS, INC.;

5 THOMAS LAURENCE, individually; and

6 ELIZABETH MEREDITH, individually,

7 Defendants.
8

9 Plaintiff, the Federal Trade Commission ("FTC"), for its Complaint alleges:

10 1. The FTC brings this action under Section 13(b) of the Federal Trade Commission
11 Act ("FTC Act"), 15 U.S.C. § 53(b), to obtain temporary, preliminary, and permanent injunctive
12 relief, restitution, the refund of monies paid, disgorgement of ill-gotten monies, the appointment
13 of a receiver, and other equitable relief for Defendants' acts or practices in violation of Section
14 5(a) of the FTC Act, 15 U.S.C. § 45(a), in connection with the advertising, marketing, and sale of
15 United States immigration and naturalization services.

16 **JURISDICTION AND VENUE**

17 2. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1337(a),
18 and 1345, and 15 U.S.C. §§ 45(a) and 53(b).

19 3. Venue is proper in this district under 28 U.S.C. § 1391(b) and (c), and 15 U.S.C.
20 § 53(b).

21 **PLAINTIFF**

22 4. The FTC is an independent agency of the United States Government created by
23 statute. 15 U.S.C. §§ 41-58. The FTC enforces Section 5(a) of the FTC Act, 15 U.S.C. § 45(a),
24 which prohibits unfair and deceptive acts or practices in or affecting commerce.

25 5. The FTC is authorized to initiate federal district court proceedings, by its own
26 attorneys, to enjoin violations of the FTC Act and to secure such equitable relief as may be
27 appropriate in each case, including injunctions, restitution, the refund of monies paid,
28

1 disgorgement of ill-gotten monies, and the appointment of a receiver. 15 U.S.C. §§ 53(b) and
2 56(a)(2)(A).

3 DEFENDANTS

4 6. Defendant Immigration Center is a Colorado nonprofit corporation with its
5 principal place of business at 160 Hubbard Way, Suite C, in Reno, Nevada. Articles of
6 incorporation representing that Immigration Center is a nonprofit corporation were filed in
7 August 2007. Notwithstanding these incorporation papers, Immigration Center is organized to
8 carry on business for its own profit or that of its members within the meaning of Section 4 of the
9 FTC Act, 15 U.S.C. § 44. Immigration Center transacts or has transacted business in this district
10 and throughout the United States. At all times material to this Complaint, acting alone or in
11 concert with others, Immigration Center has marketed and/or sold immigration and naturalization
12 services to consumers throughout the United States.

13 7. Defendant Immigration Forms and Publications, Inc., is a Missouri corporation,
14 with its mailing address and principal place of business at 119 E. 3rd Street in Sedalia, Missouri.
15 Immigration Forms and Publications, Inc., transacts or has transacted business in this district and
16 throughout the United States. At all times material to this Complaint, acting alone or in concert
17 with others, Immigration Forms and Publications, Inc., has marketed and/or sold immigration
18 and naturalization services to consumers throughout the United States.

19 8. Defendant Charles Doucette, also known as Charles R. Doucette and Charles
20 Robert Doucette, Jr., acting alone or in concert with others, has formulated, directed, controlled,
21 had the authority to control, or participated in the acts or practices set forth in this Complaint.
22 Doucette is a director and registered agent of Defendant Immigration Center. At all times
23 material to this Complaint, acting alone or in concert with others, Doucette has marketed and/or
24 sold immigration and naturalization services under various trade names, including but not limited
25 to Telestaffing, Immigration Forms and Services, Immigration Form Processing, Maydene
26 Media, Liberty Legal Services, Immigration Forms and Documents, and American Legal Project.
27 He is or has been a signatory on bank accounts through which he has authorized payments to or
28 received payments from persons or entities in apparent furtherance of the acts or practices set

1 forth in this Complaint. He is and has been responsible for hiring and training employees and
2 independent contractors of Defendants Immigration Center and Immigration Forms and
3 Publications, Inc. Doucette resides in this district and, in connection with the matters alleged
4 herein, transacts or has transacted business in this district and throughout the United States.

5 9. Defendant Deborah Stilson, also known as Deborah Malmstrom, acting alone or
6 in concert with others, has formulated, directed, controlled, had the authority to control, or
7 participated in the acts and practices set forth in this Complaint. At all times material to this
8 Complaint, acting alone or in concert with others, Stilson has marketed and/or sold immigration
9 and naturalization services through various Colorado trade names including, but not limited to
10 Liberty Legal Services, American Legal Services, and Ninner. On behalf of Immigration Center,
11 Stilson routinely advised consumers on immigration matters, processed consumer payments, and
12 received consumer complaints. Stilson also signed a contract under the Colorado trade name
13 Ninner to provide services to Defendant Immigration Forms and Publications, Inc. According to
14 the terms of the contract, Ninner agreed to provide all websites, marketing, telephone service,
15 equipment, shipping, and deposit and wire transfer services for IFP. Stilson resides in this
16 district, and, in connection with the matters alleged herein, transacts or has transacted business in
17 this district and throughout the United States.

18 10. Defendant Alfred Boyce, acting alone or in concert with others, has formulated,
19 directed, controlled, had the authority to control, or participated in the acts and practices set forth
20 in this Complaint. At all times material to this Complaint, acting alone or in concert with others,
21 Boyce has marketed and/or sold immigration and naturalization services through various trade
22 names, including but not limited to the Colorado trade name Maydene Web Services. Boyce is
23 and has been responsible for the daily operations of Defendant Immigration Center. Boyce
24 resides in this district and in connection with the matters alleged herein, transacts or has
25 transacted business in this district and throughout the United States.

26 11. Defendant Thomas Strawbridge, acting alone or in concert with others, has
27 formulated, directed, controlled, had the authority to control, or participated in the acts and
28 practices set forth in this Complaint. Strawbridge is the President and owner of Defendant

1 Immigration Forms and Publications, Inc. At all times material to this Complaint, acting alone or
2 in concert with others, Strawbridge has marketed and/or sold immigration and naturalization
3 services to consumers throughout the United States. Strawbridge has signed contracts as the
4 President and owner of Immigration Forms and Publications, Inc. Strawbridge is also listed as
5 the contact for Immigration Forms and Publications, Inc.'s account with Federal Express.
6 Strawbridge resides in Sedalia, Missouri and, in connection with the matters alleged herein,
7 transacts or has transacted business in this district and throughout the United States.

8 12. Defendant Robin Meredith, acting alone or in concert with others, has formulated,
9 directed, controlled, had the authority to control, or participated in the acts and practices set forth
10 in this Complaint. Meredith is the Vice-President of Defendant Immigration Forms and
11 Publications, Inc. At all times material to this Complaint, acting alone or in concert with others,
12 Meredith has marketed and/or sold immigration and naturalization services to consumers
13 throughout the United States. Meredith is or has been a signatory on Immigration Forms and
14 Publications, Inc.'s bank accounts, through which she has initiated the wiring of significant funds
15 to Defendant Charles Doucette. Meredith resides in Sedalia, Missouri and, in connection with
16 the matters alleged herein, transacts or has transacted business in this district and throughout the
17 United States.

18 13. Defendant Thomas Laurence, acting alone or in concert with others, has
19 formulated, directed, controlled, had the authority to control, or participated in the acts and
20 practices set forth in this Complaint. Laurence is an employee and manager of Defendant
21 Immigration Forms and Publications, Inc. At all times material to this Complaint, acting alone or
22 in concert with others, Laurence has marketed and/or sold immigration and naturalization
23 services to consumers throughout the United States. Laurence is and has been responsible for the
24 daily operations of Defendant Immigration Forms and Publications, Inc. Laurence resides in
25 Sedalia, Missouri and in connection with the matters alleged herein, transacts or has transacted
26 business in this district and throughout the United States.

27 14. Defendant Elizabeth Meredith, acting alone or in concert with others, has
28 formulated, directed, controlled, had the authority to control, or participated in the acts and

1 practices set forth in this Complaint. Meredith is an employee and manager of Defendant
2 Immigration Forms and Publications, Inc. At all times material to this Complaint, acting alone or
3 in concert with others, Meredith has marketed and/or sold immigration and naturalization
4 services to consumers throughout the United States. Meredith is and has been responsible for the
5 daily operations of Defendant Immigration Forms and Publications, Inc. Meredith resides in
6 Sedalia, Missouri and in connection with the matters alleged herein, transacts or has transacted
7 business in this district and throughout the United States.

8 COMMERCE

9 15. At all times material to this Complaint, Defendants have maintained a substantial
10 course of trade in or affecting commerce, as "commerce" is defined in Section 4 of the FTC Act,
11 15 U.S.C. § 44.

12 DEFENDANTS' BUSINESS PRACTICES

13 16. Since at least June 2007, Defendants Immigration Center, Charles Doucette,
14 Deborah Stilson, and Alfred Boyce have advertised, marketed, and sold immigration and
15 naturalization services to consumers nationwide. In addition to advertising, marketing, and
16 selling the services to consumers directly, Defendants Charles Doucette and Deborah Stilson
17 have furthered the illegal scheme by providing training, equipment, and websites to Defendants
18 Immigration Forms and Publications, Inc., Thomas Strawbridge, Robin Meredith, Thomas
19 Laurence, and Elizabeth Meredith to permit them to advertise, market, and sell immigration and
20 naturalization services. Defendants' immigration and naturalization services include, but are not
21 limited to, selecting, preparing, and completing immigration forms and documents, and filing
22 them with the United States Citizenship and Immigration Services ("USCIS") on behalf of
23 consumers. In the course of advertising, marketing, and selling United States immigration and
24 naturalization services to consumers, Defendants misrepresent that: (1) they are authorized to
25 provide immigration and naturalization services in the United States; (2) they are part of or
26 affiliated with the United States government; and (3) the fees they charge consumers will cover
27 all USCIS processing fees.

28 17. Defendants Immigration Center, Charles Doucette, Deborah Stilson, and Alfred

1 Boyce have marketed their services to consumers throughout the United States through various
2 websites, including, but not limited to, the following: www.immigrationhelpline.org; www.uscis-
3 ins.us; www.usgovernmenthelpline.com; www.uscis-helpline.info; and www.usa-helpline.info.

4 18. Since at least June 2009, Defendants Immigration Forms and Publications, Inc.,
5 Thomas Strawbridge, Robin Meredith, Thomas Laurence, and Elizabeth Meredith have marketed
6 their services to consumers through various websites, including, but not limited to,
7 www.immformspub.com.

8 19. Defendants pay major Internet search engines such as Bing, Google, and Yahoo to
9 ensure that links to their websites appear at the top of immigration-related searches, including
10 searches for "USCIS."

11 20. Defendants provide and have provided immigration and naturalization services to
12 consumers from various countries, including, but not limited to, Haiti, Canada, Mexico, Ethiopia,
13 and countries in Asia.

14 **Misrepresentation That Defendants Are Authorized to Provide**
15 **Immigration and Naturalization Services in the United States**

16 21. Defendants claim, expressly or by implication, that Defendants are authorized to
17 provide immigration and naturalization services in the United States. For example, on one
18 Immigration Center website, Defendants represent that they are a "group of specialists formerly
19 employed at a U.S. Immigration office" who will help consumers file their applications with the
20 USCIS. On another Immigration Center website, Defendants represent that they "help people
21 deal with the laws and processes" of applying for immigration benefits. Defendant Immigration
22 Forms and Publications, Inc.'s website represents that it "specialize[s] in helping [consumers]
23 find and prepare the correct up to date forms," and helps consumers by "go[ing] step by step
24 through the process of filling out the forms and getting the correct material ready to file."

25 22. In some instances, Defendant Immigration Center's agents inform consumers that
26 they are "qualified and certified" and "trained" to provide immigration and naturalization
27 services to consumers.

28 23. Defendant Immigration Center's employees are also instructed to inform

1 consumers that document specialists who complete the immigration forms for consumers are
2 experts and have previously worked for "Immigration and Nationalization [sic] Services," a
3 reference to the agency that preceded the USCIS.

4 24. Defendant Immigration Forms and Publications, Inc.'s employees are instructed to
5 inform consumers that Defendants can do everything that the USCIS can do.

6 25. Defendants' claim that they are authorized to provide immigration and
7 naturalization services in the United States is false. To be authorized to provide immigration and
8 naturalization services, an individual must be authorized to represent persons before the U.S.
9 Department of Homeland Security or the U.S. Department of Justice.

10 26. The only individuals authorized to represent persons in immigration and
11 naturalization matters before the U.S. Department of Homeland Security or the U.S. Department
12 of Justice are individuals who meet the requirements of 8 C.F.R. § 292.1 or 8 C.F.R. § 1292.1.
13 Defendants do not meet those requirements. Specifically, no Individual Defendant or employee
14 of a Corporate Defendant is:

- 15 a. a licensed attorney in any state;
- 16 b. a law student acting under the supervision of a licensed attorney or
17 accredited representative who is appearing without direct or indirect
18 remuneration;
- 19 c. an individual granted permission to appear on behalf of persons with
20 whom he has a pre-existing relationship and from whom he received no
21 direct or indirect remuneration;
- 22 d. an accredited representative of an organization accredited by the Board of
23 Immigration Appeals; or
- 24 e. a person otherwise authorized to practice before the Board of Immigration
25 Appeals, the United States Citizenship and Immigration Services, the
26 United States Customs and Border Protection, or the United States
27 Immigration and Customs Enforcement.

Misrepresentations that Defendants are Affiliated with the United States Government

1
2 27. Defendants' websites prominently display seals or graphics including an
3 American bald eagle, the flag of the United States, and the Statue of Liberty that make the
4 websites resemble United States government websites.

5 28. Defendant Immigration Center uses URL names for its websites that resemble
6 United States government websites. For example, Defendant Immigration Center's website
7 URLs include the phrases "uscis-ins.us," "usgovernmenthelpline," and "uscis-helpline."

8 29. Defendants' websites direct consumers to call toll-free numbers. In numerous
9 instances, once consumers call the toll-free number, an automated voice answers the call,
10 "Immigration Center."

11 30. Consumers who call Defendant Immigration Center are transferred to a live
12 person who identifies him or herself as an "agent," "immigration officer," or "support specialist."

13 31. Consumers who call Defendant Immigration Forms and Publications, Inc. are
14 transferred to a live person who identifies him or herself as a "caseworker."

15 32. Once consumers communicate their immigration needs, Defendants select
16 immigration forms and documents for the consumer. In numerous cases, Defendants inform
17 consumers that an "immigration package" containing the proper USCIS forms will be sent via
18 mail or email to consumers. Typically, consumers receive a package that includes a letter
19 bearing an official-looking seal and instructions to contact the assigned, named immigration
20 agent or caseworker once they receive their "immigration package." Defendants indicate that the
21 agent will help consumers prepare immigration forms by reviewing each question with them. In
22 some instances, Defendants offer to carefully review and file the immigration forms on behalf of
23 the consumers.

24 33. In numerous instances, consumers who call Defendants' toll-free numbers believe
25 that they are talking to an agent of the USCIS, the U.S. Department of Homeland Security, or
26 another agency of the United States government.

27 34. In fact, Defendants are not part of or affiliated with the USCIS, the U.S.
28 Department of Homeland Security, or any agency of the United States government. On

1 information and belief, Defendants' employees are not current or former immigration agents or
2 employees of any United States government agency.

3 35. On their websites, Defendants state that they are not affiliated with the United
4 States government. However, Defendants' disclaimers are inadequate and ineffective. Typically,
5 consumers do not see the disclaimers because they are written in small, hard-to-read print, and
6 are not easily seen on the web pages that consumers view. In numerous instances, consumers
7 must scroll down to the bottom of Defendants' web page to find the disclaimer.

8 Misrepresentations about Fees and Services

9 36. Once consumers agree to accept Defendants' services, they are transferred to or
10 contacted by Defendants' "verification department."

11 37. During the verification phase of the call, Defendants' agents inform consumers
12 that an "immigration package" containing the proper USCIS forms will be mailed to consumers
13 by email or overnight mail. In numerous instances, Defendants record consumers' acceptance of
14 Defendants' services.

15 38. In numerous instances, Defendants explain to consumers that they charge fees
16 from \$200 to \$2500 depending on the immigration and naturalization services consumers seek.
17 In numerous instances, Defendants' agents explain to consumers that the fee is to be paid on
18 delivery to the person delivering the immigration package. In numerous instances, consumers are
19 unable to obtain or view the materials in the immigration package before paying Defendants.

20 39. In numerous instances, Defendants' agents fail to explain to consumers that their
21 fees will cover only Defendants' services, not USCIS processing fees. In numerous instances,
22 when consumers ask Defendants' agents what the fees will cover, Defendants' agents tell
23 consumers that the fees charged will cover "processing." In numerous instances, consumers
24 believe their payment to Defendants is being paid to the United States government to process
25 their immigration documents because the fees Defendants charge are typically the same as
26 USCIS processing fees and Defendants' websites appear to be part of or affiliated with the
27 United States government. In other instances, consumers believe that the fees will cover both the
28 Defendants' services and any USCIS processing fees.

1 40. In numerous instances, the fee that Defendants charge is identical or similar to
2 the fee that the USCIS charges to process the corresponding immigration or naturalization form.
3 For example, if a person wants to replace a lost or stolen permanent resident card, the USCIS
4 provides the form and assists the consumer in filling it out for free, and then charges \$290 to
5 process the form. Defendants, however, charge \$290 for just a copy of the form and assistance in
6 filling it out.

7 41. Defendant Immigration Center's agents have instructed consumers to have
8 payment ready in the form of a money order, personal check, or cashier's check made payable to
9 "Immigration Center," "Immigration Form Processing," or "Immigration Forms."

10 42. Defendant Immigration Forms and Publications, Inc.'s agents have instructed
11 consumers to have payment in the form of a money order or cashier's check made payable to
12 "Immigration Forms and Publications" or "IFP."

13 43. During the verification phase of the call, Defendants' agents verbally disclose to
14 consumers that:

15 In the future, the Department of Homeland Security may or may not require
16 additional forms or fees. In the event that the USCIS requires you to, or you
17 choose to apply for future USCIS benefits, there may be additional fees. The US
Department of Homeland Security and the USCIS can raise fees or impose new
fees at any time[] without notice.

18 However, by the time they hear this, consumers typically have already been convinced by
19 Defendants that their payment to Defendants is going to the USCIS and will cover USCIS
20 processing fees for their benefit application. Therefore, in many instances, consumers believe
21 that the "additional fees" that the U.S. Department of Homeland Security "may or may not
22 require" would be for "future" applications, not the current application for benefits for which the
23 consumers have already paid Defendants.

24 44. In fact, the fees Defendants charge consumers do not cover USCIS processing
25 fees. Often, consumers submit the completed applications to a USCIS address that Defendants'
26 agents provide in the immigration package. When they do, the USCIS returns the forms to
27 consumers for failure to include the fee for processing the documents. This is when many
28 consumers realize that Defendants are not part of or affiliated with the United States government.

1 45. On information and belief, Defendant Immigration Center has recently modified
2 some of its practices. Following the initial sales call, in some instances, Defendant Immigration
3 Center sends consumers an email, from an "agent," enclosing an authorization letter and the
4 signature page of the immigration form that Defendant Immigration Center selects for the
5 consumer. The email requests that consumers sign both forms and return them along with a
6 check made payable to "Immigration Forms" and copies of documents needed to complete their
7 application.

8 46. The authorization letter bears the official seal of the United States and indicates
9 that a "service fee," identical to the amount of the check requested by Defendant Immigration
10 Center, is due for the consumers' application and that the application will be completed by
11 "INSTANT ELECTRONIC PROCESSING."

12 47. The authorization letter also includes the following disclosure:

13 I approve of the services, fees, and costs stated in this authorization. I authorize
14 Provider to do the work and to bill bank account as specified. All banking
15 information will remain secure and duplicate fees will be electronically forwarded
16 to the United States Department of Homeland Security through a bank draft.
17 Endorsement of this authorization constitutes your authorization to duplicate your
18 banking information for the sole purpose of payment of United States Department
19 of Homeland Security application fees[.]

20 However, this disclosure is inadequate because it does not make clear that the fees consumers
21 pay are for Defendant Immigration Center's services and do not cover USCIS processing fees.

22 48. Based on Defendants' misrepresentations that: (1) Defendants are authorized to
23 provide immigration and naturalization services in the United States; (2) they are part of or
24 affiliated with the United States government; or (3) the fees they charge consumers will cover all
25 USCIS processing fees, consumers paid hundreds or even thousands of dollars each for
26 Defendants' services.

27 VIOLETIONS OF THE FTC ACT

28 49. Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), prohibits "unfair or deceptive acts
or practices in or affecting commerce."

1 50. Misrepresentations constitute deceptive acts or practices prohibited by Section
2 5(a) of the FTC Act.

3 **COUNT ONE**

4 **MISREPRESENTATION THAT DEFENDANTS ARE AUTHORIZED TO PROVIDE**
5 **IMMIGRATION AND NATURALIZATION SERVICES**

6 51. In numerous instances, in connection with the advertising, marketing, promotion,
7 offering for sale, or sale of immigration and naturalization services, Defendants have represented,
8 directly or indirectly, expressly or by implication, that Defendants are authorized to provide
9 immigration and naturalization services in the United States.

10 52. In truth and in fact, Defendants are not authorized to provide immigration and
11 naturalization services in the United States.

12 53. Therefore, Defendants' representations as set forth in Paragraph 51 of this
13 Complaint are false and misleading and constitute deceptive acts or practices in violation of
14 Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

15 **COUNT TWO**

16 **MISREPRESENTATION THAT DEFENDANTS ARE AFFILIATED**
17 **WITH THE UNITED STATES GOVERNMENT**

18 54. In numerous instances in connection with the advertising, marketing, promotion,
19 offering for sale, or sale of immigration and naturalization services, Defendants have represented,
20 directly or indirectly, expressly or by implication, that Defendants are part of or affiliated with
21 the USCIS, the U.S. Department of Homeland Security, or one or more agencies of the United
22 States government.

23 55. In truth and in fact, Defendants are not part of or affiliated with the USCIS, the
24 U.S. Department of Homeland Security, or one or more agencies of the United States
25 government.

26 56. Therefore, Defendants' representations as set forth in Paragraph 54 are false and
27 misleading and constitute deceptive acts or practices in violation of Section 5(a) of the FTC Act,
28 15 U.S.C. § 45(a).

COUNT THREE

MISREPRESENTATIONS ABOUT FEES AND SERVICES

57. In numerous instances in connection with the advertising, marketing, promotion, offering for sale, or sale of immigration and naturalization services, Defendants have represented, directly or indirectly, expressly or by implication, that fees consumers pay to Defendants will cover all costs associated with submitting documents to the USCIS.

58. In truth and in fact, the fees consumers pay to Defendants do not cover all costs associated with submitting documents to the USCIS.

59. Therefore, Defendants representations as set forth in Paragraph 57 are false and misleading and constitute deceptive acts or practices in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

COUNT FOUR

MEANS AND INSTRUMENTALITIES

60. In numerous instances, in connection with the advertising, marketing, promotion, offering for sale, or sale of immigration and naturalization services, Defendants Charles Doucette and Deborah Stilson, individually or in concert with others, have provided Defendants Immigration Forms and Publications, Inc., Thomas Strawbridge, Robin Meredith, Thomas Laurence, and Elizabeth Meredith with the means and instrumentalities to deceive consumers, as described in Paragraphs 51-59 above. The means and instrumentalities these Defendants have provided include, but are not limited to:

- a. Training employees about immigration and naturalization product knowledge, prices, and responses to consumer's questions and requests;
- b. Websites;
- c. Marketing for websites;
- d. Telephone service and equipment;
- e. Shipping for all orders; and
- f. Deposit and wire transfers of payments received from packages sent by or on behalf of Defendant Immigration Forms and Publications, Inc.

1 61. By providing the means and instrumentalities to others for the commission of
2 deceptive acts and practices as described in Paragraph 60, Defendants Charles Doucette and
3 Deborah Stilson have violated Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

4 **CONSUMER INJURY**

5 62. Consumers have suffered and will continue to suffer substantial injury as a result
6 of Defendants' violations of the FTC Act. In addition, Defendants have been unjustly enriched
7 as a result of their unlawful acts or practices. Absent injunctive relief by this Court, Defendants
8 are likely to continue to injure consumers, reap unjust enrichment, and harm the public interest.

9 **THIS COURT'S POWER TO GRANT RELIEF**

10 63. Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), empowers this Court to grant
11 injunctive and such other relief as the Court may deem appropriate to halt and redress violations
12 of any provision of law enforced by the FTC. The Court, in the exercise of its equitable
13 jurisdiction, may award ancillary relief, including restitution, the refund of monies paid,
14 disgorgement of ill-gotten monies, and the appointment of a receiver to prevent and remedy any
15 violation of any provision of law enforced by the FTC.

16 **PRAYER FOR RELIEF**

17 64. Wherefore, Plaintiff FTC, pursuant to Section 13(b) of the FTC Act, 15 U.S.C. §
18 53(b), and the Court's own equitable powers, requests that the Court:

- 19 a. Award Plaintiff such preliminary injunctive and ancillary relief as may be
20 necessary to avert the likelihood of consumer injury during the pendency
21 of this action and to preserve the possibility of effective final relief,
22 including, but not limited to, temporary and preliminary injunctions, an
23 order freezing assets, immediate access, and the appointment of a receiver;
- 24 b. Enter a permanent injunction to prevent future violations of the FTC Act
25 by Defendants;
- 26 c. Award such relief as the Court finds necessary to redress injury to
27 consumers resulting from Defendants' violations of the FTC Act,
28 including, but not limited to, restitution, the refund of monies paid, and

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

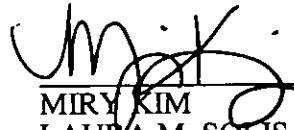
disgorgement of ill-gotten monies; and

d. Award Plaintiff the costs of bringing this action, as well as such other and additional relief as the Court may determine to be just and proper.

Respectfully Submitted,

WILLARD K. TOM
General Counsel
ROBERT J. SCHROEDER
Regional Director

Dated: January 26, 2011



MIRY KIM
LAURA M. SOLIS
Federal Trade Commission
915 Second Ave., Suite 2896
Seattle, WA 98174
(206) 220-6350

Attorneys for Plaintiff
FEDERAL TRADE COMMISSION