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

13
14 FEDERAL TRADE COMMISSION

15 Plaintiff,

16 v.

Civil Action No.

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,
25 AMERICAN LEGAL SERVICES, and
NINNER;

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

**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
15 of United States immigration and naturalization services.
16

17 **JURISDICTION AND VENUE**

18 2. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1337(a),
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

22 **PLAINTIFF**

23 4. The FTC is an independent agency of the United States Government created by
24 statute. 15 U.S.C. §§ 41-58. The FTC enforces Section 5(a) of the FTC Act, 15 U.S.C. § 45(a),
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,
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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
12 naturalization 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
25 limited to Telestaffing, Immigration Forms and Services, Immigration Form Processing,
26 Maydene Media, Liberty Legal Services, Immigration Forms and Documents, and American
27 Legal Project. He is or has been a signatory on bank accounts through which he has authorized
28 payments to or received payments from persons or entities in apparent furtherance of the acts or

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

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

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

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

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

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

28 14. Defendant Elizabeth Meredith, acting alone or in concert with others, has

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

9 COMMERCE

10 15. At all times material to this Complaint, Defendants have maintained a substantial
11 course of trade in or affecting commerce, as “commerce” is defined in Section 4 of the FTC Act,
12 15 U.S.C. § 44.

13 DEFENDANTS’ BUSINESS PRACTICES

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

1 17. Defendants Immigration Center, Charles Doucette, Deborah Stilson, and Alfred
2 Boyce have marketed their services to consumers throughout the United States through various
3 websites, including, but not limited to, the following: www.immigrationhelpline.org;
4 www.uscis-ins.us; www.usgovernmenthelpline.com; www.uscis-helpline.info; and www.usa-
5 helpline.info.

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

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

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

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

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

27 22. In some instances, Defendant Immigration Center’s agents inform consumers that
28 they are “qualified and certified” and “trained” to provide immigration and naturalization

1 services to consumers.

2 23. Defendant Immigration Center's employees are also instructed to inform
3 consumers that document specialists who complete the immigration forms for consumers are
4 experts and have previously worked for "Immigration and Nationalization [sic] Services," a
5 reference to the agency that preceded the USCIS.

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

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

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

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

Immigration and Customs Enforcement.

Misrepresentations that Defendants are Affiliated with the United States Government

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

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

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

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

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

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

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

1 United States government. In other instances, consumers believe that the fees will cover both
2 the Defendants' services and any USCIS processing fees.

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

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

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

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

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

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

28 44. In fact, the fees Defendants charge consumers do not cover USCIS processing
fees. Often, consumers submit the completed applications to a USCIS address that Defendants'
agents provide in the immigration package. When they do, the USCIS returns the forms to

1 consumers for failure to include the fee for processing the documents. This is when many
2 consumers realize that Defendants are not part of or affiliated with the United States
3 government.

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

11 46. The authorization letter bears the official seal of the United States and indicates
12 that a “service fee,” identical to the amount of the check requested by Defendant Immigration
13 Center, is due for the consumers’ application and that the application will be completed by
14 “INSTANT ELECTRONIC PROCESSING.”

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

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

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

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

1 **VIOLATIONS OF THE FTC ACT**

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

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

6 **COUNT ONE**

7 **MISREPRESENTATION THAT DEFENDANTS ARE AUTHORIZED TO PROVIDE**
8 **IMMIGRATION AND NATURALIZATION SERVICES**

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

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

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

18 **COUNT TWO**

19 **MISREPRESENTATION THAT DEFENDANTS ARE AFFILIATED**
20 **WITH THE UNITED STATES GOVERNMENT**

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

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

- 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.

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

CONSUMER INJURY

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

THIS COURT'S POWER TO GRANT RELIEF

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

PRAYER FOR RELIEF

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

- a. Award Plaintiff such preliminary injunctive and ancillary relief as may be necessary to avert the likelihood of consumer injury during the pendency of this action and to preserve the possibility of effective final relief, including, but not limited to, temporary and preliminary injunctions, an order freezing assets, immediate access, and the appointment of a receiver;
- b. Enter a permanent injunction to prevent future violations of the FTC Act

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- by Defendants;
- c. Award such relief as the Court finds necessary to redress injury to consumers resulting from Defendants' violations of the FTC Act, including, but not limited to, restitution, the refund of monies paid, and 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: _____

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