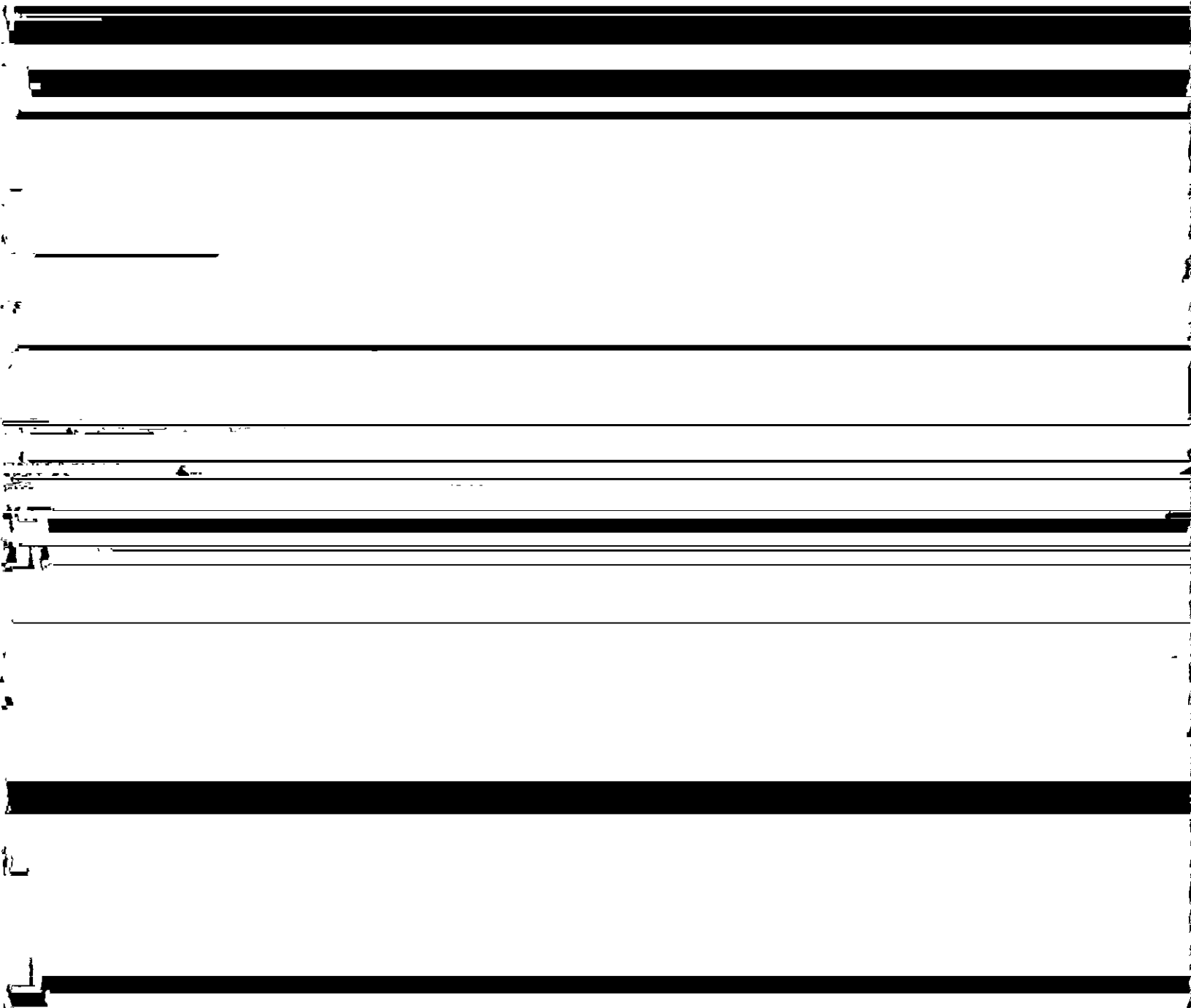




On June 1, 2011, Plaintiff, the Federal Trade Commission ("FTC"), pursuant to Section 13(b) of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. § 53(b), filed its Complaint for Injunctive and Other Equitable Relief and an *Ex Parte* Application for Temporary

### FINDINGS

1. This Court has jurisdiction over the subject matter of this case, and there is good cause to believe it has jurisdiction over Defendants Loma International Business Group, Inc.



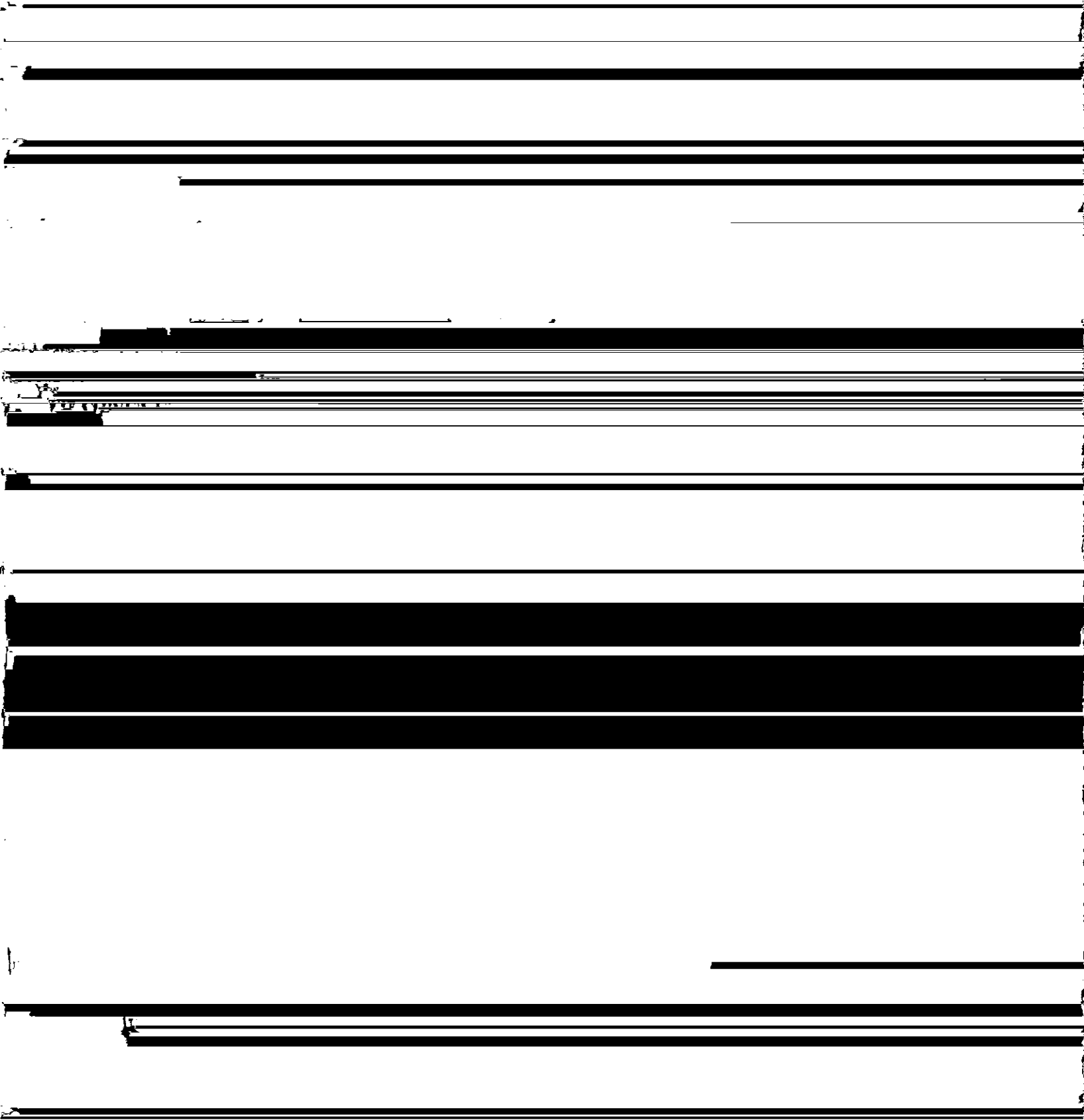
...relinquished control and retained by O. J. ...

Defendant's assets to remain frozen

There is evidence ...



other form to use, or providing advice regarding these selections; (c) advising a person regarding the requirements for obtaining a visa, a work permit, temporary protected status, residency, or



**II. Customer Information**

**IT IS FURTHER ORDERED** that Defendants, and their officers, agents, servants, employees, attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this Order by personal service or otherwise, are preliminarily restrained and enjoined from using, selling, renting, leasing, transferring, or otherwise disclosing or benefitting from the name, address, birth date, telephone number, email address, passport number, Social Security number, credit or debit card number, bank account number, or other financial or identifying personal information of any person from whom or about whom any Defendant obtained such information in connection with activities alleged in the FTC's Complaint.

~~Provided, however, that Defendants may disclose such financial and identifi~~

The Federal Trade Commission has filed a lawsuit against Loma International Business Group, Inc., Servicios LatinoAmericanos de Maryland, Inc., Manuel E. Alban, and Lola P. Alban, alleging that they have engaged in deceptive practices relating to the advertising, marketing, promotion, offering for sale, sale, or provision of immigration services. The United States District Court

prohibiting the alleged practices. The Defendants deny that they have violated the law.

You may obtain additional information from the court-appointed Monitor, **H. Mark Stichel, Esq.**, of Gohn, Hankey, & Stichel, LLP, 201 North Charles Street, Suite 2101, Baltimore, Maryland, 21201, at (410) 752-1658 or the Federal Trade Commission.

The foregoing notice may be supplemented or translated at the direction of the Monitor or by agreement of the parties.

#### **ASSET FREEZE AND DUTIES OF THIRD PARTIES**

##### **IV. Asset Freeze**

**IT IS FURTHER ORDERED** that Defendants, and their officers, agents, servants,







E. Defendants' request for any additional frozen funds for ordinary and necessary living expenses is subject to approval by this Court. The FTC shall be allowed 10 business days to respond to any request by Defendants for additional frozen funds for ordinary and necessary


living expenses.

**VI. Legal Fees and Expenses**

**IT IS FURTHER ORDERED** that Defendants may from time to time file a motion with this Court for reasonable legal fees and expenses. Any request for legal fees and expenses is subject to approval by the Court. The FTC shall be allowed 10 business days to respond to

3. \_\_\_\_\_ that are subject to access or use by, or under the signatory power of, any

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Defendant or other party subject to Section IV above;

B. Deny Defendants access to any safe deposit boxes or storage facilities that are either:

1. titled in the name, individually or jointly, of any Defendant, or other party subject to Section IV above; or

2. subject to access by any Defendant or other party subject to Section IV above;

C. Provide the FTC, within five (5) days of the date of service of this Order, a sworn statement setting forth:

1. The identification number of each account or asset titled in the name, individually or jointly, of any Defendant, or held on behalf of, or for the benefit of, any Defendant or other party subject to Section IV above, including all trust accounts managed on behalf of any Defendant or subject to any Defendant's control;

2. The balance of each such account, or a description of the nature and value of such asset;

3. The identification and location of any safe deposit box, commercial mail

[REDACTED]

D. Allow representatives of Plaintiff FTC immediate access to inspect and copy, or upon Plaintiff FTC's request, within five (5) business days of said request, provide the FTC with copies of all records or other documentation pertaining to each such account or asset, including

[REDACTED]

but not limited to, originals or copies of account applications, account statements, corporate

[REDACTED]

are held by or for any Defendant or are under any Defendant's direct or indirect control jointly

financial institution or other entity holding the documents and assets, along with the account numbers and balances;

C. Hold and retain all such documents and assets and prevent any transfer,

managed by the individual Defendants, regardless of whether it is a defendant in this case. The financial statements shall be accurate as of the date and time of entry of the TRO; and

C. Each Defendant shall also prepare and deliver to FTC counsel a completed statement, verified under oath:

1. specifying the name and address of each financial institution and brokerage firm at which the Defendant has accounts or safe deposit boxes. Said statements shall include assets held in foreign as well as domestic accounts; and

other data which, in reasonable detail, accurately, fairly and completely reflect the incomes, disbursements, transactions, dispositions, and uses of the Defendants' assets;

B. Destroying, erasing, mutilating, concealing, altering, transferring, or otherwise disposing of, in any manner, directly or indirectly, any documents, including electronically-stored materials, that relate in any way to the business practices or business or personal finances of Defendants; to the business practices or finances of entities directly or indirectly under the control of Defendants; or to the business practices or finances of entities directly or indirectly under common control with any other Defendant; and



XII Monitor's Duties and Authority

IT IS FURTHER ORDERED that the Monitor shall have the following duties and authority:

A Monitor the Defendants' compliance with this Order.

3. requiring any persons present on the business premises at the time this Order to demonstrate to the satisfaction of the Monitor that such persons are not removing from the premises client files related to immigration services;

D. Identify, review, and copy the Defendants' business records and financial transactions as they relate to the immigration services practices alleged in the FTC's Complaint and ensure that all such documents are preserved;

E. Identify and create a contact list of all Defendants' immigration services customers;

F. Provide timely notice to Defendants' immigration services customers of their right to take possession of their own files related to immigration services;

who request their files related to immigration services;

1. Access to all documents, including files related to immigration services, pertaining to Defendants' immigration services activities and finances wherever located and in whomever's custody or control;
2. Access to all property or premises in possession of, owned by, or under the control of Defendants, wherever located;
3. The right to interview any current or former employee of Defendants;
4. The right to interview any of Defendants' current or former officers, managers, independent contractors, subcontractors, financial institutions, vendors,

**XIII. Reporting by the Monitor**

**IT IS FURTHER ORDERED** that no later than 30 days after the date of entry of this Order, the Monitor is authorized and directed to prepare and submit a report to this Court and to the parties describing the Defendants' business activities, including, but not limited to:

- A. The Defendants' compliance with this Order;
- B. A description of the Defendants' structures, including all parents, subsidiaries, (whether wholly or partially owned) divisions (whether incorporated or not) affiliates

3. all net revenues (gross revenues minus refunds) obtained from the sale of immigration services from January 1, 2001, through the date of the issuance of the TRO;

4. the full name, address, and telephone number of every purchaser or recipient of immigration services from January 1, 2001, through the date of the issuance of the TRO; and

5. This separate detailed accounting shall be provided no later than 60 days from the date of entry of this Order;

E. Preparing and submitting additional reports, observations, and recommendations to the Court, upon reasonable notice to the parties, and seek guidance and instructions from this Court as is necessary; and

F. If the Monitor has any reason to believe that the report would reveal any trade

electronic file or telephone data in any medium. Defendants are enjoined from:

enjoined from directly or indirectly:

A. Transacting any of the immigration services business of Defendants:

B. Destroying, secreting, defacing, transferring, or otherwise altering or disposing of

*YV... Defendants' Petition to the Monitor*

**IT IS FURTHER ORDERED** that Defendants are preliminarily restrained and enjoined from creating, operating, or exercising any control over any business entity, including any

D. Any Defendant who receives mail or any delivery addressed to a Defendant

**XVII. Compensation of the Monitor**

**IT IS FURTHER ORDERED** that the Monitor, and personnel hired by the Monitor to perform the duties under this Order, are entitled to a reasonable compensation for the performance of duties pursuant to this Order and for the cost of actual out-of-pocket expenses incurred by them, from the Defendants' assets. To obtain payment, the Monitor shall file with



A. Take the deposition of any person or entity, whether or not a party, for the purpose of discovering the nature, location, status, and extent of the assets of Defendants, and Defendants' affiliates and subsidiaries; the nature and location of documents reflecting the business transactions of Defendants, and Defendants' affiliates and subsidiaries; the location of

Section, shall be sufficient if made through the means described in Section XX of this Order.

**XX. Service of this Order**

**IT IS FURTHER ORDERED** that copies of this Order may be distributed by U.S. first class mail, overnight delivery, facsimile, electronic mail, or personally, by agents or employees of Plaintiff FTC, by agents or employees of the Monitor, by any law enforcement agency, or by private process server, upon any person, financial institution, or other entity that may have

identifying the names, titles, addresses, and telephone numbers of the persons and entities

[REDACTED]

STIPULATED by:

WILLARD K. TOM  
General Counsel

DEANVA T. KUECKELHAN