



1 Plaintiff, the Federal Trade Commission (“Commission” or “FTC”), filed its Complaint  
2 for a Permanent Injunction and Other Equitable Relief (“Complaint”) in this matter, pursuant to  
3 Section 13(b) of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. § 53(b).

4 The Commission and Defendants Forms Direct, Inc. d/b/a Immigration Direct, on behalf  
5 of itself and as successor in interest to American Immigration Center Inc., File Right, LLC,  
6 United Immigration Inc., and US Immigration Technology LLC, and Cesare Alessandrini  
7 (collectively, “Defendants”) stipulate to the entry of this Stipulated Order for Permanent  
8 Injunction and Monetary Judgment (“Order”) to resolve all matters in dispute in this action  
9 between them.

10 THEREFORE, IT IS ORDERED as follows:

11 **FINDINGS**

- 12 1. This Court has jurisdiction over this matter.
- 13 2. The Complaint charges that Defendants participated in deceptive acts or practices in  
14 violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).
- 15 3. Defendants neither admit nor deny any of the allegations in the Complaint, except as  
16 specifically stated in this Order. Only for purposes of this action, Defendants admit the facts  
17 necessary to establish jurisdiction.
- 18 4. Defendants waive any claim that they may have under the Equal Access to Justice Act, 28  
19 U.S.C. § 2412, concerning the prosecution of this action through the date of this Order, and agree  
20 to bear their own costs and attorney fees.
- 21 5. Defendants and the Commission waive all rights to appeal or otherwise challenge or  
22 contest the validity of this Order.

23 **DEFINITIONS**

24 For the purpose of this Order, the following definitions apply:

25 A. “**Clear(ly) and conspicuous(ly)**” means that a disclosure required by this Order is  
26 difficult to miss (i.e., easily noticeable) and easily understandable by ordinary consumers,  
27 including in all of the following ways:

- 28 1. In any communication that is solely visual or solely audible, the disclosure must be

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made through the same means through whic

1 C. **“Dedicated Landing Page”** means the first webpage a consumer sees upon reaching a  
2 website that positions any required text or image at or near the center of the website page to be  
3 visible in its entirety without scrolling, and fills the majority of the visible page space for desktop  
4 users and at least one-third (1/3) of the visible page space for mobile or tablet users.

5 D. **“Defendants”** means the Individual Defendant and the Corporate Defendant, individually,  
6 collectively, or in any combination.

7 E. **“Individual Defendant”** means Cesare Alessandrini.

8 F. **“Overlay”** means a content box that is displayed on top of a website page in a color and  
9 format that contrasts with that page, is positioned at or near the center of the website page to be  
10 unavoidable and visible in its entirety without scrolling, and fills the majority of the visible page  
11 space for desktop users and at least one-third (1/3) of the visible page space for mobile or tablet  
12 users.

13 G. **“The Websites”** mean immigrationdirect.com, uscitizenship.info, us-immigration.com,  
14 usimmigration.us, usimmigrationcitizenship.com, and any other website owned, operated, or  
15 controlled partially or wholly by any of the Defendants that is involved in the sale of any U.S.  
16 immigration government form preparation services.

17 **ORDER**

18 **I. PROHIBITION AGAINST MISREPRESENTATIONS**

19 IT IS HEREBY ORDERED that, in connection with promoting or offering for sale any service or  
20 product, Defendants, Defendants’ officers, agents, employees, and attorneys, and all other persons  
21 in active concert or participation with any of them, who receive actual notice of this Order,  
22 whether acting directly or indirectly, are permanently restrained and enjoined from:

23 A. Misrepresenting or assisting others in misrepresenting, expressly or by implication, that  
24 any of the Defendants, or any other person, is affiliated with, licensed or sponsored by, or  
25 otherwise connected to any government entity; and

26 B. Misrepresenting or assisting others in misrepresenting, expressly or by implication, any  
27 fact material to consumers concerning any good or service, including but not limited to:

28 1. The identity of the company or individual providing the good or service;

2. The total cost to purchase, receive, or use the good or service; or
3. Any other fact material to consumers concerning the good or service.

**II. MANDATORY DISCLOSURE OF MATERIAL INFORMATION RELATING TO  
THE SALE OF U.S. IMMIGRATION GOVERNMENT FORM PREPARATION  
SERVICES**

IT IS FURTHER ORDERED that, in connection with the advertising, marketing, promotion, offering for sale, or sale of any products or services to assist in the preparation of U.S. immigration government forms, Defendants, Defendants' officers, agents, employees, and attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this Order, whether acting directly or indirectly, are permanently restrained and enjoined from:

A. Failing to disclose, Clearly and Conspicuously, that:

1. The individuals or entities offering the U.S. immigration government form preparation services for sale are not endorsed by or affiliated with any government entity; and
2. Consumers must separately submit their completed U.S. immigration government applications, along with any relevant government fees, to the applicable government entity (collectively, "Required Disclosures").

B. In the case of sales conducted verbally or through audible means, failing to disclose, Clearly and Conspicuously, the Required Disclosures before obtaining personal or billing information from consumers.

C. In the case of The Websites, failing to disclose, Clearly and Conspicuously, the Required Disclosures through a Dedicated Landing Page or an Overlay, immediately after a consumer either first reaches the website or interacts with the website by clicking anywhere on the landing webpage. In order to navigate away from the Dedicated Landing Page or Overlay, consumers must check the box at the bottom of the Required Disclosures. The Dedicated Landing Page or Overlay also may not contain any other text or image other than the following:

Before you continue, please understand that:

" This website is run by a private company. We have no connection to U.S.



1 included in the fee Defendants charge, and (3) any applicable government fee that consumers  
2 must still separately pay to the applicable government entity.

3 **III. MONETARY JUDGMENT**

4 IT IS FURTHER ORDERED that:

5 A. Judgment in the amount of Two Million and Two Hundred Thousand Dollars  
6 (\$2,200,000) is entered in favor of the Commission against the Corporate Defendant as equitable  
7 monetary relief.

8 B. The Corporate Defendant is ordered to pay to the Commission Two Million and Two  
9 Hundred Thousand Dollars(\$2,200,000) which, as the Corporate Defendant stipulates, its  
10 undersigned counsel holds in escrow for no purpose other than payment to the Commission. Such  
11 payment must be made within 7 days of entry of this Order by electronic fund transfer in  
12 accordance with instructions previously provided by a representative of the Commission.

13 **IV. ADDITIONAL MONETARY PROVISIONS**

14 IT IS FURTHER ORDERED that:

15 A. Defendants relinquish dominion and all legal and equitable right, title, and interest in all  
16 assets transferred pursuant to this Order and may not seek the return of any assets.

17 B. The facts alleged in the Complaint will be taken as true, without further proof, in any  
18 subsequent civil litigation by or on behalf of the Commission arising out of this Order, including  
19 in a proceeding to enforce its rights to any payment or monetary judgment pursuant to this Order,  
20 such as a nondischargeability complaint in any bankruptcy case.

21 C. The facts alleged in the Complaint establish all elements necessary to sustain an action by  
22 the Commission pursuant to Section 523(a)(2)(A) of the Bankruptcy Code, 11 U.S.C.  
23 § 523(a)(2)(A), and this Order will have collateral estoppel effect for such purposes.

24 D. The Corporate Defendant acknowledges its Taxpayer Identification Number (Employer  
25 Identification Number), which the Corporate Defendant must submit to the Commission, may be  
26 used for collecting and reporting on any delinquent amount arising out of this Order, in  
27 accordance with 31 U.S.C. §7701.

28 E. All money paid to the Commission pursuant to this Order may be deposited into a fund

1 administered by the Commission or its designee to be used for equitable relief, including  
2 consumer redress and any attendant expenses for the administration of any redress fund. If a  
3 representative of the Commission decides that direct redress to consumers is wholly or partially  
4 impracticable or money remains after redress is completed, the Commission may apply any  
5 remaining money for such other equitable relief (including consumer information remedies) as it  
6 determines to be reasonably related to Defendants' practices alleged in the Complaint. Any  
7 money not used for such equitable relief is to be deposited to the U.S. Treasury as disgorgement.  
8 Defendants have no right to challenge any actions

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1 C. From each individual or entity to which a De  
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1 or controls directly or indirectly that may affect compliance obligations arising under this Order,  
2 including: creation, merger, sale, or dissolution of the entity or any subsidiary, parent, or affiliate  
3 that engages in any acts or practices subject to this Order.

4 2. Additionally, each Individual Defendant must report any change in: (a) name, including  
5 aliases or fictitious name, or residence address; or (b) title or role in any business activity,  
6 including any business for which such Defendant performs services whether as an employee or  
7 otherwise and any entity in which such Defendant has any ownership interest, and identify the  
8 name, physical address, and any Internet address of the business or entity.

9 C. Each Defendant must submit to the Commission notice of the filing of any bankruptcy  
10 petition, insolvency proceeding, or similar proceeding by or against such Defendant within 14  
11 days of its filing.

12 D. Any submission to the Commission required by this Order to be sworn under penalty of  
13 perjury must be true and accurate and comply with 28 U.S.C. § 1746, such as by concluding: “I  
14 declare under penalty of perjury under the laws of the United States of America that the foregoing  
15 is true and correct. Executed on: \_\_\_\_\_” and supplying the date, signatory’s full name, title (if  
16 applicable), and signature.

17 E. Unless otherwise directed by a Commission representative in writing, all submissions to  
18 the Commission pursuant to this Order must be emailed to DEbrief@ftc.gov or sent by overnight  
19 courier (not the U.S. Postal Service) to: Associate Director for Enforcement, Bureau of  
20 Consumer Protection, Federal Trade Commission, 600 Pennsylvania Avenue NW, Washington,  
21 DC 20580. The subject line must begin: FTC v. Forms Direct, Inc.

## 22 **VIII. RECORDKEEPING**

23 IT IS FURTHER ORDERED that Defendants must create certain records for 10 years after entry  
24 of the Order, and retain each such record for 5 years. Specifically, the Corporate Defendant in  
25 connection with the sale of any U.S. immigration government form preparation services and the  
26 Individual Defendant, for any business that such Defendant, individually or collectively with any  
27 other Defendants, is a majority owner or controls directly or indirectly, must create and retain the  
28 following records:

- 1 A. accounting records showing the revenues from all goods or services sold;
- 2 B. personnel records showing, for each person providing services, whether as an employee or  
3 otherwise, that person's: name; addresses; telephone numbers; job title or position; dates of  
4 service; and (if applicable) the reason for termination;
- 5 C. records of all consumer complaints and refund requests, whether received directly or  
6 indirectly, such as through a third party, and any response;
- 7 D. all records necessary to demonstrate full compliance with each provision of this Order,  
8 including all submissions to the Commission; and
- 9 E. a representative copy of each materially different advertisement, sales script, or other  
10 marketing material in connection with the sale of any U.S. immigration government form  
11 preparation services, including any webpages of The Websites that describe the products or  
12 services offered for sale or the fees consumers pay, such as the homepage, the product page, or  
13 the order page.

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