

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

STIPULATED ), 1 \$ /  
ORDER CASENO.

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



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

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

D. "Defendants" means the Individual Defendant and the Corporate Defendant, individually, collectively, or in any combination. collE030 1B023

- 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 the preparation of U.S. immigration government forms, Defendants, Defendants' officers, agents, employees, and attorneys, and all other persons in active connection 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 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 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 Overlay, immediately after a consumer either first reaches the website or interacts with website by clicking anywhere on the landing webpage. In order to navigate away from a 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  
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



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

administered by the Commission or its designated de- to used for equitable relief, including  
consumer redress and any attendant expenses for administration of any redress fund. If a  
representative of the Commission certifies that direct redress to consumers is wholly or partially  
impracticable or money remains after redress is completed, the Commission may apply any  
remaining money for such other equitable relief (including consumer information remedies) as it  
determines to be reasonably related to Defendants' practices alleged in the Complaint. Any  
money not used for such equitable relief is to be deposited to the U.S. Treasury as disgorgement.  
Defendants have no right to challenge any action the Commission or its representatives may take  
pursuant to this Subsection.



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



- 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; address; 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 material offered advertisement, sales script, or other  
10 marketing material in connection with the use 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.

14 IX. COMPLIANCE MONITORING

15 IT IS FURTHER ORDERED that, for the purpose of monitoring Defendants' compliance with  
16 this Order:

- 17 A. Within 14 days of receipt of a written request from a representative of the Commission,  
18 each Defendant must: submit additional compliance reports or other requested information,  
19 which must be sworn under penalty of perjury and appear for depositions; and produce documents  
20 for inspection and copying. The Commission is authorized to obtain discovery, without  
21 further leave of court, using any of the procedures prescribed by Federal  
22  
23  
24  
25  
26  
27  
28

‡ 4^h â5@ © ) j z \ | 0 | % · ) ] w | A È 6 o Ñ 2 3 y B C " D ä ç 7 8 9 5 · d # | 6 ä ä | |  
 í ç 7 F ð ç 8 z · î þ ð Ñ \$ 8 T S % { 0 þ ç À " ï · « é p a ] 0 | 0 q i Á \_ - í þ & þ '  
 p | ` ' + « ð | K ' = þ ð Ñ 9 || c > || ç ð £ (É ↑ ) ð E F w Q ð 8 | Š ? · N  
 z | ? 2 9 ( < / ) K K & = 2 ! 5 " : # 0 \*

FOR THE PLAINTIFF FEDERAL  
 TRADE COMMISSION  


6/29/18  
 Date

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

Certificate of Service

I HEREBY CERTIFY that on ~~October~~ October 15, 2018, I served a true and correct copy of the foregoing Stipulated Final Order For Permanent Injunction And Monetary Judgment on the following counsel for Defendants via electronic mail:

JOHN D. GRAUBERT  
Covington & Burling LLP  
One CityCenter  
850 Tenth Street, NW  
Washington, DC 20001-4956  
Tel. 202-662-5938  
Fax: 202-778-5938  
Email: [jgraubert@cov.com](mailto:jgraubert@cov.com)  
Counsel for Defendants

Dated: October 15, 2018

/s/ Patricia B. Hsue  
Patricia B. Hsue  
Roberto Anguizola  
Federal Trade Commission