



§ 53(b), and the Telemarketing and Consumer Fraud and Abuse Prevention Act (“Telemarketing Act”), 15 U.S.C. §§ 6101-6108. The Commission and Defendants Avinadav Rubeni, United Legal Center, LLC, and United Legal Center, Inc. (“Stipulating Defendants”) stipulate to entry of the Permanent Injunction and Final Order (“Order”) to resolve all matters in dispute in this action between them.

**THEREFORE, IT IS ORDERED** as follows:

**FINDINGS**

formulating or providing, or arranging for the formulation or provision of, any advertising or marketing material, including any telephone sales script, direct mail solicitation, or the design, text, or use of images of any Internet website, email, or other electronic communication; (3) formulating or providing, or arranging for the formulation or provision of, any marketing support material or service, including web or Internet Protocol addresses or domain name registration for any Internet websites, affiliate marketing services, or media placement services; (4) providing names of, or assisting in the generation of, potential customers; (5) performing

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- 1 a. stop, prevent, or postpone any mortgage or deed of  
2 foreclosure sale for a person's dwelling, any other sale of  
3 collateral, any repossession of a person's dwelling or other  
4 collateral, or otherwise save a person's dwelling or other  
5 collateral from foreclosure or repossession;
- 6 b. negotiate, obtain, or arrange a modification, or  
7 renegotiate, settle, or in any way alter any terms of the  
8 mortgage, loan, debt, or obligation, including a reduction in the  
9 amount of interest, principal balance, monthly payments, or  
10 fees owed by a person to a secured or unsecured creditor or debt  
11 collector;
- 12 c. obtain any forbearance or modification in the timing of  
13 payments from any secured or unsecured holder or servicer of  
14 any mortgage, loan, debt, or obligation;
- 15 d. negotiate, obtain, or arrange any extension of the period  
16 of time within which a person may (i) cure his or her default on  
17 the mortgage, loan, debt, or obligation, (ii) reinstate his or her  
18 mortgage, loan, debt, or obligation, (iii) redeem a dwelling or  
19 other collateral, or (iv) exercise any right to reinstate the  
20 mortgage, loan, debt, or obligation or redeem a dwelling or  
21 other collateral;
- 22 e. obtain any waiver of an acceleration clause or balloon  
23 payment contained in any promissory note or contract secured  
24 by any dwelling or other collateral; or
- 25 f. negotiate, obtain, or arrange (i) a short sale of a dwelling  
26 or other collateral, (ii) a deed-in-lieu of foreclosure, or (iii) any





6. whether any specified minimum payment amount covers both interest and principal, or whether the credit has or can result







accordance with instructions pr



1 represents the consumer injury caused by Stipulating Defendants, less any payment  
2 previously made pursuant to this Section, plus interest computed from the date of  
3 entry of this Order.

4 J. In the event that Stipulating Defendant Avinadav Rubeni fails to  
5 timely complete the payment required by Section IV.B.4 of this Order, Thomas W.  
6 McNamara of McNamara Smith LLP, is appointed as Receiver with all the rights,  
7 powers, and privileges of an equity receiver over The Property, for the limited  
8 purpose of selling The Property, including, but not limited to, the land, buildings,  
9 and any and all fixtures, appurtenances, and improvements, except anything owned  
10 by a tenant or third party and not owned by Stipulating Defendant Avinadav  
11 Rubeni, in a commercially reasonable fashion without further approval from the  
12 Court.

13 K. Within seven (7) days of failing to timely complete the payment  
14 required by Section IV.B.4, Stipulating Defendant Avinadav Rubeni shall take all  
15 actions necessary to transfer possession of The Property to the Receiver appointed  
16 in Section IV.J of this Order for liquidation.

17 L. In the event that transfer to the Receiver is required under this Order,  
18 Stipulating Defendant Avinadav Rubeni shall:

19 1. Cooperate fully with the Receiver and take such other steps as  
20 the Receiver may require in connection with the listing, marketing, and sale of The  
21 Property;

22 2. Take all steps requested by the Receiver to assist and cooperate  
23 with the Receiver in the sale of The Property, including the provision of all  
24 documents, contracts, and leases related to The Property, and any utility bills and  
25 account information, including any passwords necessary to change such accounts;

3. Sign any documents necessary for the sale of The Property, including, but not limited to, any powers of attorney that the Receiver may request him to sign in connection with the sale of The Property and any documents necessary for the transfer of The Property to new buyers, as well as any documents necessary to transfer any accounts, mail, or notices related to The Property to the Receiver;

4. Cooperate fully and not interfere with the Receiver's efforts to enter onto, market, and sell The Property, including, but not limited to, the Receiver's efforts to gain access to and show The Property to prospective purchasers or brokers or to evaluate or cause its agents, representatives, or contractors to maintain, repair, restore, and evaluate the condition of the property from the entry of this Order and thereafter. Upon request of the Receiver, Stipulating Defendant Avinadav Rubeni shall provide a set of all keys and/or codes used for The Property to the Receiver and/or its agent(s);

5. Until possession, custody, and control of The Property is transferred to the Receiver, maintain property and liability insurance on The Property for at least its replacement value; remain current on all amounts due and payable on The Property, including, but not limited to, taxes, utilities, reasonable and necessary maintenance, homeowner's assessments, sewer and/or water use charges and similar fees; manage and maintain The Property in good working order; shall take no action to diminish the value of The Property; and promptly provide the Commission and the Receiver with written paid receipts to the satisfaction of Commission representatives and the Receiver upon the transfer of The Property. In the event that The Property suffers any loss or damage covered by any applicable insurance policy prior to the transfer of The Property to the Receiver, Stipulating Defendant Avinadav Rubeni shall make such claims as are

Permanent Injunction as to  
Defendants Avinadav Rubeni, United Legal Center, LLC,  
and United Legal Center, Inc. 13

Federal Trade Commission  
915 2<sup>nd</sup> Ave., Ste. 2896  
Seattle, Washington 98174  
(206) 220-6350



M. In the event that transfer to the Receiver is required under this Order, the Court-appointed Receiver, Thomas W. McNamara, shall:

1. As soon as reasonably possible, at reasonable cost and in a commercially reasonable fashion, liquidate The Property at a private sale without further notice, hearing, confirmation, or order and is deemed sufficient pursuant to 28 U.S.C. § 2001. Counsel for the Commission shall approve the final sale price of The Property;

2. Upon Stipulating Defendant Avinadav Rubeni's transfer of possession of The Property, assume responsibility for management and maintenance of The Property, including, but not limited to, making disbursements for operating expenses as may be appropriate, undertaking repairs, procuring appropriate insurance or modifying existing insurance, making payment for all amounts due and payable on The Property, including, but not limited to, taxes, insurance, homeowner's assessments, reasonable and necessary ma





N. All net proceeds of the sale of The Property, after all necessary expenses of the Receiver are paid pursuant to this Order, shall be paid to the Commission in accordance with instructions provided by a representative of the Commission. The costs and expenses of the Receiver, including ad valorem taxes, any transfer fees, recording fees, other fees, advertising, and any commissions associated with or resulting from the sale of The Property shall be paid from the proceeds of the sale at the time The Property is sold.

O. Upon sale of The Property, Stipulating Defendant Avinadav Rubeni forever waives, releases, discharges, and disclaims all right, title, and interest, including any homestead, in The Property.

#### **V. OTHER MONETARY PROVISIONS**

**IT IS FURTHER ORDERED** that:

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

B. The facts alleged in the Complaint will be taken as true, without further proof, in any subsequent civil litigation by or on behalf of the Commission, including in a proceeding to enforce its rights to any payment or money judgment pursuant to this Order, such as a non-dischargeability complaint in any bankruptcy case.

C. The facts alleged in the Complaint establish all elements necessary to sustain an action by the Commission pursuant to Section 523(a)(2)(A) of the Bankruptcy Code, 11 U.S.C. § 523(

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submitted to the Commission, may be used for collecting and reporting on any delinquent amount arising out of this Order, in accordance with 31 U.S.C. § 7701.

E. All money paid to the Commission pursuant to this Order may be deposited into a fund administered by the Commission or its designee to be used for equitable relief, including consumer redress and any attendant expenses for the administration of any redress fund. If a representative of the Commission decides 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 Stipulating 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. Stipulating Defendants have no right to challenge any actions the Commission or its representative may take pursuant to this Subsection.

F. Upon entry of this Order the freeze on the assets of Stipulating Defendant Avinadav Rubeni shall be lifted. The freeze on the assets of Stipulating Defendants United Legal Center, LLC, and United Legal Center, Inc., shall remain in effect until such time as the Receiver receives payment of all Court-approved fees and expenses of the Receiver and the Receiver is discharged. A financial institution shall be entitled to



interviews, discovery, hearings, trials, and any other proceedings that a Commission representative may designate, without the service of a subpoena.

### **VIII. COOPERATION WITH RECEIVER**

**IT IS FURTHER ORDERED** that Stipulating Defendants shall not interfere with the Receiver's performance of his duties and shall cooperate fully with the Receiver to complete his duties, including, but not limited to, cooperation as to the Receiver's pursuit of any claims against other persons or entities and the Receiver's pursuit of any funds or assets of a Receivership Defendant. Stipulating Defendants shall execute any documents requested by the Receiver necessary to transfer assets or ownership interests to the Receiver. If it becomes necessary to execute additional documents to transfer or liquidate assets of a Receivership Defendant or any other assets that are surrendered under this order or to wind up the Receivership Defendants, Stipulating Defendants must execute all documents requested by the Receiver within five (5) days of receipt from the Receiver.

### **IX. RECEIVERSHIP WRAP UP AND TERMINATION**

**IT IS FURTHER ORDERED** that the Receiver shall endeavor to complete all duties of the Receiver relative to Stipulating Defendants and file a Final Report and Final Fee Application within 180 days after entry of this Order, but any party or the Receiver may request an extension or shortening of the Receiver's term for good cause. Upon the ruling of the Court on all pending motions by the Receiver for the approval of fees and expenses of the Receiver and his professionals, the Receiver may withdraw all approved amounts for receivership expenses from the receivership account and transfer the balance to the account of the Commission.

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A. Each Stipulating Defendant, within seven (7) days of entry of this Order, must submit to the Commission an acknowledgment of receipt of this Order sworn under penalty of perjury.

B. For five (5) years after entry of this Order, Stipulating Defendant Avinadav Rubeni for any business that he is the majority owner or controls directly or indirectly, and United Legal Center, LLC, and United Legal Center, Inc., and their successors and assigns, must deliver a copy of this Order to: (1) all principals, officers, directors, and LLC managers and members; (2) all employees having managerial responsibilities for conduct related to the subject matter of the Order and all agents and representatives who participate in conduct related to the subject matter of the Order; and (3) any business entity resulting from any change in structure as set forth in the Section titled Compliance Reporting. Delivery must occur within seven (7) days of entry of this Order for current personnel. For all others, delivery must occur before they assume their responsibilities.

C. From each individual or entity to which a Stipulating Defendant delivered a copy of this Order, that Stipulating Defendant must obtain, within thirty (30) days, a signed and dated acknowledgment of receipt of this Order.

## **XI. COMPLIANCE REPORTING**

**IT IS FURTHER ORDERED** that Stipulating Defendants make timely submissions to the Commission:

A. One year after entry of this Order, Stipulating Defendants must submit a compliance report, sworn under penalty of perjury.

1. Each Stipulating Defendant must: (a) identify the primary physical, postal, and email address and telephone number, as designated points of contact, which represen

1 Defendant's businesses by all of their names, telephone numbers, and  
2 physical, postal, email, and Internet addresses; (c) describe the activities of  
3 each business including the goods and services offered, the means of  
4 advertising, marketing, and sales, and the involvement of any other  
5 Defendant (which Stipulating Defendant Avinadav Rubeni must describe if  
6 he knows or should know due to his own involvement); (d) describe in detail  
7 whether and how that Stipulating Defendant is in compliance with each  
8 Section of this Order; and (e) provide a copy of each Order  
9 Acknowledgment obtained pursuant to this Order, unless previously  
10 submitted to the Commission.

11 2. Additionally, Stipulating Defendant Avinadav Rubeni must: (a)  
12 identify all telephone numbers and all physical, postal, email and Internet  
13 addresses, including all residences; (b) identify all business activities,  
14 including any business for which he performs services whether as an  
15 employee or otherwise, and any entity in which such Stipulating Defendant  
16 has any ownership interest; and (c) describe in detail such Stipulating  
17 Defendant's involvement in each such business, including title, role,  
18 responsibilities, participation, authority, control, and any ownership.

19 B. For ten (10) years after entry of this Order, each Stipulating Defendant  
20 must submit a compliance notice, sworn under penalty of perjury, within fourteen  
21 (14) days of any change in the following:

22 1. Each Stipulating Defendant must report any change in: (a) any  
23 designated point of contact; or (b) the structure of United Legal Center,  
24 LLC, and United Legal Center, Inc., and their successors and assigns, or any  
25 entity that Stipulating Defendant Avinadav Rubeni has any ownership  
26 interest in or controls directly or indirectly that may affect compliance

1 obligations arising under this Order, including: creation, merger, sale, or  
2 dissolution of the entity or any subsidiary, parent, or affiliate that engages in  
3 any acts or practices subject to this Order.

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

11 C. Each Stipulating Defendant must submit to the Commission notice of  
12 the filing of any bankruptcy petition, insolvency proceeding, or similar proceeding  
13 by or against such Stipulating Defendant within fourteen (14) days of its filing.

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

20 E. Unless otherwise directed by a Commission representative in writing,  
21 all submissions to the Commission pursuant to this Order must be emailed to  
22 DEbrief@ftc.gov or sent by overnight courier (not the U.S. Postal Service) to:  
23 Associate Director for Enforcement, Bureau of Consumer Protection, Federal  
24 Trade Commission, 600 Pennsylvania Avenue NW, Washington, DC 20580. The  
25 subject line must begin: FTC v. Alliance Document Preparation, LLC, *et al.*,  
26 X170054.

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28 Defendants Avinadav Rubeni, United Legal Center, LLC,  
and United Legal Center, Inc. 23

Federal Trade Commission  
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## **XII. RECORDKEEPING**

**IT IS FURTHER ORDERED** that Stipulating Defendants must create certain records for ten (10) years after entry of the Order, and retain each such record for five (5) years. Specifically, United Legal Center, LLC, United Legal Center, Inc., and their successors and assigns, and Stipulating Defendant Avinadav Rubeni, for any business that he is a majority owner or controls directly or indirectly, and that is engaged in conduct that affects compliance with this Order, must create and retain the following records: (a) accounting records showing the revenues from all goods or services sold; (b) personnel records showing, for each person providing services, whether as an employee or otherwise, that person's: name; addresses; telephone numbers; job title or position; dates of service; and (if applicable) the reason for termination; (c) records of all consumer complaints and refund requests, whether received directly or indirectly, such as through a thir



further leave of court, using any of the procedures prescribed by Federal Rules of Civil Procedure 29, 30 (including telephonic depositions), 31, 33, 34, 36, 45, and 69.

B. For matters concerning this Order, the Commission is authorized to communicate directly with Stipulating Defendants. Stipulating Defendants must permit representatives of the Commission to interview any employee or other person affiliated with Stipulating Defendants who has agreed to such an interview. The person interviewed may have counsel present.

C. The Commission may use all other lawful means, including posing, through its representatives, as consumers, suppliers, or other individuals or entities, to Stipulating Defendants or any individual or entity affiliated with Stipulating Defendants, without the necessity of identification or prior notice. Nothing in this Order limits the Commission's lawful use of compulsory process, pursuant to Sections 9 and 20 of the FTC Act, 15 U.S.C. §§ 49, 57b-1.

D. Upon written request from a representative of the Commission, any consumer reporting agency must furnish consumer reports concerning Avinadav Rubeni, pursuant to Section 604(1) of the Fair Credit Reporting Act, 15 U.S.C. §1681b(a)(1).

#### **XIV. ENTRY OF FINAL ORDER**

**IT IS FURTHER ORDERED** that there is no just reason for delay of entry of this final order, and that, pursuant to Federal Rule of Civil Procedure 54(b), the Clerk immediately shall enter this Order as a final order as to Stipulating Defendants.

