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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

FEDERAL TRADE COMMISSION,

Plaintiff,

vs.

IMMIGRATION CENTER, *et al.*,

Defendants.

Case No. 3:11-CV-00055-LRH (VPC)

**DEFAULT JUDGMENT
AND ORDER FOR PERMANENT
INJUNCTION AND MONETARY RELIEF
AS TO DEFENDANTS IMMIGRATION
FORMS AND PUBLICATIONS, INC.,
THOMAS STRAWBRIDGE, ROBIN
MEREDITH, THOMAS LAURENCE,
AND ELIZABETH MEREDITH**

Plaintiff, the Federal Trade Commission (“FTC” or “Commission”), having filed a complaint under Section 13(b) of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C.

1 § 53(b), to obtain preliminary and permanent injunctive relief, consumer restitution, refunds,
2 disgorgement, and other equitable relief for defendants’ deceptive acts or practices in violation of
3 Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), and the Clerk of the Court having entered a
4 default against Defendants Immigration Forms and Publications, Inc., Thomas Strawbridge,
5 Elizabeth Meredith, Thomas Laurence, and Robin Meredith (“Defaulting Defendants”), and the
6 Court having considered the pleadings, declarations, exhibits, and memoranda filed by the
7 Commission, and now being advised in the premises, pursuant to Rule 55(b)(2) of the Federal
8 Rules of Civil Procedure, makes the following findings and enters the following Order for
9 Permanent Injunction and Monetary Relief as to Defaulting Defendants:

10 **FINDINGS**

11 1. This Court has jurisdiction over the subject matter of this action and all of the
12 parties thereto pursuant to 15 U.S.C. §§ 45(a) and 53(b), and 28 U.S.C. §§ 1331, 1337(a) and
13 1345.

14 2. Venue is proper in this District under 15 U.S.C. § 53(b) and 28 U.S.C. § 1391(b)
15 and (c).

16 3. The Commission is charged, *inter alia*, with responsibility for administering and
17 enforcing Section 5 of the FTC Act, 15 U.S.C. § 45, which prohibits unfair or deceptive acts or
18 practices in or affecting commerce.

19 4. The activities of Defaulting Defendants, as alleged in the Complaint, are in or
20 affecting commerce, as defined in Section 4 of the FTC Act, 15 U.S.C. § 44.

21 5. This action was instituted by the Commission under Sections 5 and 13(b) of the
22 FTC Act, 15 U.S.C. §§ 45 and 53(b). The Commission seeks permanent injunctive relief and
23 monetary redress for the alleged deceptive acts or practices of Defaulting Defendants in
24 connection with the advertising, marketing, promotion, offering for sale, or sale of immigration
25 and naturalization services to U.S. consumers. Pursuant to Section 13(b) of the FTC Act, the
26 Commission has the authority to seek the relief it has requested.

1 6. The Complaint states claims upon which relief may be granted against Defaulting
2 Defendants, under Sections 5(a) and 13(b) of the FTC Act, 15 U.S.C. §§ 45(a) and 53(b).

3 7. Defaulting Defendants were served with the Summons and Complaint as required
4 by Rule 4 of the Federal Rules of Civil Procedure.

5 8. Defaulting Defendants each failed to file an answer with the Clerk of the Court as
6 required by Rule 12(a) of the Federal Rules of Civil Procedure or otherwise defend this action.
7 The Clerk of the Court, pursuant to Rule 55(a) of the Federal Rules of Civil Procedure and Local
8 Rule 77-1(b)(2), entered default against Defaulting Defendants on March 16, 2011. The FTC is
9 therefore entitled to a default judgment pursuant to Rule 55(b)(2) of the Federal Rules of Civil
10 Procedure and Local Rule 77-1(b)(2).

11 9. Because of Defaulting Defendants' default, the allegations in the Complaint filed
12 in this action are taken as true.

13 10. The Court now finds that Defaulting Defendants, in connection with the
14 advertising, marketing, promotion, offering for sale, or sale of immigration and naturalization
15 services, have violated Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), by falsely representing,
16 directly or indirectly, expressly or by implication, that:

- 17 a. Defaulting Defendants are authorized to provide immigration and
18 naturalization services in the United States;
- 19 b. Defaulting Defendants are part of or affiliated with the U.S. Citizenship
20 and Immigration Services ("USCIS"), the U.S. Department of Homeland
21 Security, or one or more agencies of the United States government; and
- 22 c. fees consumers pay to Defaulting Defendants will cover all costs
23 associated with submitting documents to the USCIS.

24 11. Defendants Thomas Laurence, Elizabeth Meredith, Thomas Strawbridge, and
25 Robin Meredith are individually liable for the violations attributed to them as described above.

1 Internet websites, affiliate marketing services, or media placement
2 services;

- 3 d. providing names of, or assisting in the generation of, potential customers;
4 e. performing marketing, billing, or payment services of any kind; and
5 f. acting or serving as an owner, officer, director, manager, or principal of
6 any entity.

7 2. **“Consumer”** means any natural person.

8 3. **“Customer”** means any person who purchased or agreed to purchase, or any
9 person on whose behalf a person purchased or agreed to purchase, immigration services from
10 any Defendant prior to the entry of this Order.

11 4. **“Defendants”** means Immigration Center; Immigration Forms and Publications,
12 Inc.; Charles Doucette; Deborah Stilson; Alfred Boyce; Thomas Strawbridge; Robin Meredith;
13 Thomas Laurence; and Elizabeth Meredith, individually, collectively, or in any combination.

14 5. **“Defaulting Defendants”** means Immigration Forms and Publications, Inc.;
15 Thomas Strawbridge; Robin Meredith; Thomas Laurence; and Elizabeth Meredith, individually,
16 collectively, or in any combination.

17 6. **“Defaulting Corporate Defendant”** means Immigration Forms and Publications,
18 Inc. and its successors and assigns.

19 7. **“Defaulting Individual Defendants”** means Thomas Strawbridge, Robin
20 Meredith, Thomas Laurence, and Elizabeth Meredith.

21 8. **“Immigration services”** means any service purporting to aid any person in any
22 immigration or naturalization matter involving the United States government, such as by: (a)
23 appearing in any immigration case, either in person or through the preparation or filing of any
24 brief, paper, application, petition, form, or other document, on behalf of another person, before
25 any branch of the United States Department of Homeland Security or the United States
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1 Department of Justice; (b) selecting which visa, work permit, temporary protective status,
2 residency, citizenship, or other immigration status or benefit to apply for, or which application or
3 other form to use, or providing advice regarding these selections; (c) advising a person regarding
4 the requirements for obtaining a visa, a work permit, temporary protective status, residency,
5 citizenship, or any other immigration status or benefit; or (d) advising a person regarding his or
6 her answers on any immigration-related document, paper, application, petition, or other form.
7

8 **ORDER**

9 **I. BAN ON PROVIDING IMMIGRATION SERVICES**

10 IT IS ORDERED that Defaulting Defendants are permanently restrained and enjoined
11 from providing, or assisting others in providing, immigration services.
12

13 **II. PROHIBITED BUSINESS ACTIVITIES REGARDING OTHER GOODS OR SERVICES**

14 IT IS FURTHER ORDERED that, in connection with the advertising, marketing,
15 promotion, offering for sale, or sale of other goods or services, Defaulting Defendants, and their
16 officers, agents, servants, employees, and attorneys, and all other persons in active concert or
17 participation with any of them who receive actual notice of this Order by personal service or
18 otherwise, are permanently restrained and enjoined from misrepresenting, or assisting others in
19 misrepresenting, directly or indirectly, expressly or by implication:
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21 A. Their education, training, or credentials, or that they are qualified or authorized to
22 provide legal advice or services;

23 B. That they are part of or affiliated with one or more agencies of the United States
24 government; and

25 C. Any material fact, including but not limited to:

26 1. The total cost to purchase, receive, or use the goods or services;

- 1 2. Any material restrictions, limitations, or conditions to purchase, receive,
2 or use the goods or services;
- 3 3. Any material aspect of the nature or terms of a refund, cancellation,
4 exchange, or repurchase policy for the goods or services; or
- 5 4. Any material aspect of the performance, efficacy, nature, or central
6 characteristics of the goods or services.

7 **III. DISPOSITION OF PAST CUSTOMER INFORMATION**

8 IT IS FURTHER ORDERED that Defaulting Defendants, and their officers, agents,
9 servants, employees, and attorneys, and all other persons in active concert or participation with
10 any of them who receive actual notice of this Order by personal service or otherwise, are
11 permanently restrained and enjoined from:

12 A. Disclosing, using or benefitting from customer information, including the name,
13 address, telephone number, email address, Social Security Number, other identifying
14 information, or any data that enables access to a customer's account (including a credit card,
15 bank account, or other financial account) that any Defendant obtained prior to entry of this
16 Order; and

17 B. Failing to dispose of such customer information in all forms in their possession,
18 custody, or control within thirty (30) days after entry of this Order. Disposal shall be by means
19 that protect against unauthorized access to the customer information, such as by burning,
20 pulverizing, or shredding any papers, and by erasing or destroying any electronic media, to
21 ensure that the customer information cannot practicably be read or reconstructed.

22 *Provided, however,* that customer information need not be disposed of, and may be
23 disclosed, to the extent requested by a government agency or required by a law, regulation, or
24 court order.

25 **IV. MONETARY JUDGMENT**

26 IT IS FURTHER ORDERED that:

1 A. Judgment is hereby entered, as equitable monetary relief, in favor of the FTC and
2 against Defaulting Defendants, jointly and severally, in the amount of six hundred two thousand,
3 nine hundred twenty-five Dollars and eighteen cents (\$602,925.18), less the sum of any amounts
4 paid to the FTC pursuant to judgment in this action by Defendants Immigration Center, Charles
5 Doucette, or Deborah Stilson;

6 B. All funds paid, collected, and/or recovered pursuant to this Order shall be
7 deposited into a fund administered by the FTC or its agent to be used for equitable relief,
8 including, but not limited to, consumer redress, and any attendant expenses for the administration
9 of such equitable relief. Defaulting Defendant shall cooperate fully to assist the FTC in
10 identifying consumers who may be entitled to redress pursuant to this Order. If the FTC
11 determines, in its sole discretion, that direct redress to consumers is wholly or partially
12 impracticable or funds remain after redress is completed, the FTC may apply any remaining
13 funds for such other equitable relief (including consumer information remedies) as it determines
14 to be reasonably related to Defaulting Defendants' practices alleged in the Complaint. Any
15 funds not used for such equitable relief shall be deposited to the United States Treasury as
16 disgorgement. Defaulting Defendants shall have no right to challenge the FTC's choice of
17 remedies under this Part B. Defaulting Defendants shall have no right to contest the manner of
18 distribution chosen by the FTC. This judgment for equitable monetary relief is solely remedial
19 in nature and is not a fine, penalty, punitive assessment, or forfeiture;

20 C. Defaulting Defendants relinquish all dominion, control, and title to the funds paid
21 to the fullest extent permitted by law; and

22 D. In accordance with 31 U.S.C. § 7701, as amended, Defaulting Defendants are
23 hereby required, unless they have already done so, to furnish to the FTC their taxpayer
24 identifying numbers (Social Security Numbers or Employer Identification Numbers), which shall
25 be used for purposes of collecting and reporting on any delinquent amount arising out of this
26 Order. Defaulting Individual Defendants are each further required, unless they have already

1 done so, to provide the FTC with a clear, legible and full-size photocopy of a valid driver's
2 license, which will be used for reporting and compliance purposes.

3 **V. ASSET FREEZE**

4 IT IS FURTHER ORDERED that, upon entry of this Order, the freeze of Defaulting
5 Defendants' assets shall be dissolved.

6 **VI. ORDER ACKNOWLEDGMENTS**

7 IT IS FURTHER ORDERED that Defaulting Defendants obtain acknowledgments of
8 receipt of this Order:

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

11 B. For five (5) years after entry of this Order, each Defaulting Individual Defendant
12 for any business that such Defaulting Individual Defendant, individually or collectively with any
13 other Defendant, is the majority owner or directly or indirectly controls, and the Defaulting
14 Corporate Defendant, must deliver a copy of this Order to: (1) all principals, officers, directors,
15 and managers; (2) all employees, agents, and representatives who participate in conduct related
16 to the subject matter of this Order; and (3) any business entity resulting from any change in
17 structure as set forth in the Section titled Compliance Reporting. Delivery must occur within 7
18 days of entry of this Order for current personnel. To all others, delivery must occur before they
19 assume their responsibilities.

20 C. From each individual or entity to which a Defaulting Defendant delivered a copy
21 of this Order, that Defaulting Defendant must obtain, within 30 days, a signed and dated
22 acknowledgment of receipt of this Order.

23 **VII. COMPLIANCE REPORTING**

24 IT IS FURTHER ORDERED that Defaulting Defendants make timely submissions to the
25 FTC:

1 A. One year after entry of this Order, each Defaulting Defendant must submit a
2 compliance report, sworn under penalty of perjury:

3 1. Each Defaulting Defendants must: (a) designate at least one telephone
4 number and an email, physical, and postal address as points of contact,
5 which representatives of the FTC may use to communicate with the
6 Defaulting Defendant; (b) identify all of that Defaulting Defendant's
7 businesses by all of their names, telephone numbers, and physical, postal,
8 email, and Internet addresses; (c) describe the activities of each business,
9 including the products and services offered, the means of advertising,
10 marketing, and sales, and the involvement of any other Defendant (which
11 Defaulting Individual Defendants must describe if they know or should
12 know due to their own involvement); (d) describe in detail whether and
13 how that Defaulting Defendant is in compliance with each Section of this
14 Order; and (e) provide a copy of each Order Acknowledgment obtained
15 pursuant to this Order, unless previously submitted to the FTC;

16 2. Additionally, each Defaulting Individual Defendant must: (a) identify all
17 telephone numbers and all email, Internet, physical, and postal addresses,
18 including all residences; (b) identify all titles and roles in all business
19 activities, including any business for which such Defaulting Defendant
20 performs services whether as an employee or otherwise and any entity in
21 which such Defaulting Defendant has any ownership interest; and (c)
22 describe in detail such Defaulting Defendant's involvement in each such
23 business, including title, role, responsibilities, participation, authority,
24 control, and any ownership.

1 B. For twenty (20) years following entry of this Order, each Defaulting Defendant
2 must submit a compliance notice, sworn under penalty of perjury, within fourteen (14) days of
3 any change in the following:

4 1. Each Defaulting Defendant must report any change in: (a) any designated
5 point of contact; or (b) the structure of the Defaulting Corporate
6 Defendant or any entity that Defaulting Defendant has any ownership
7 interest in or directly or indirectly controls that may affect compliance
8 obligations arising under this Order, including: creation, merger, sale, or
9 dissolution of the entity or any subsidiary, parent, or affiliate that engages
10 in any acts or practices subject to this Order.

11 2. Additionally, each Defaulting Individual Defendant must report any
12 change in: (a) name, including aliases or fictitious name, or residence
13 address; or (b) title or role in any business activity, including any business
14 for which such Defaulting Defendant performs services whether as an
15 employee or otherwise and any entity in which such Defaulting Defendant
16 has any ownership interest, and identify its name, physical address, and
17 Internet address, if any.

18 C. Each Defaulting Defendant must submit to the FTC notice of the filing of any
19 bankruptcy petition, insolvency proceeding, or any similar proceeding by or against such
20 Defaulting Defendant within fourteen (14) days of its filing.

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

1 E. Unless otherwise directed by an FTC representative in writing, all submissions to
2 the FTC pursuant to this Order must be emailed to Debrief@ftc.gov or sent by overnight courier
3 (not the U.S. Postal Service) to: Associate Director for Enforcement, Bureau of Consumer
4 Protection, Federal Trade Commission, 600 Pennsylvania Avenue NW, Washington, DC 20580.
5 The subject line must begin: *FTC v. Immigration Center, et al.*, X110013.

6 **VIII. RECORD KEEPING**

7 IT IS FURTHER ORDERED that Defaulting Defendants must create certain records for
8 twenty (20) years after entry of the Order, and to retain each such record for five (5) years.
9 Specifically, the Defaulting Corporate Defendant and each Defaulting Individual Defendant, for
10 any business in which that Defaulting Defendant, individually or collectively with any other
11 Defendants, is a majority owner or directly or indirectly controls, must maintain the following
12 records:

13 A. Accounting records showing the revenues from all goods or services sold, all
14 costs incurred in generating those revenues, and the resulting net profit or loss;

15 B. Personnel records showing, for each person providing services, whether as an
16 employee or otherwise, that person's: name, addresses, and telephone numbers; job title or
17 position; dates of service; and, if applicable, the reason for termination;

18 C. Complaints and refund requests, whether received directly or indirectly, such as
19 through a third party, and any response;

20 D. All records necessary to demonstrate full compliance with each provision of this
21 Order, including all submissions to the FTC; and

22 E. A copy of each advertisement or other marketing material.

23 **IX. COMPLIANCE MONITORING**

24 IT IS FURTHER ORDERED that, for the purpose of monitoring Defaulting Defendants'
25 compliance with this Order:

1 A. Within fourteen (14) days of receipt of a written request from a representative of
2 the FTC, each Defaulting Defendant must: submit additional compliance reports or other
3 requested information, which must be sworn under penalty of perjury; appear for depositions;
4 and produce documents, for inspection and copying. The FTC is also authorized to obtain
5 discovery, without further leave of court, using any of the procedures described by Federal Rules
6 of Civil Procedure 29, 30 (including telephonic depositions), 31, 33, 34, 36, 45, and 69.

7 B. For matters concerning this Order, the FTC is authorized to communicate directly
8 with each Defaulting Defendant. Defaulting Defendant must permit representatives of the FTC
9 to interview any employee or other person affiliated with any Defendant who has agreed to such
10 an interview. The person interviewed may have counsel present.

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

16 **X. RETENTION OF JURISDICTION**

17 IT IS FURTHER ORDERED that this Court retains jurisdiction of this matter for
18 purposes of construction, modification, and enforcement of this Order.

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20 **IT IS SO ORDERED**, this 29th day of February, 2012.

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LARRY R. HICKS
UNITED STATES DISTRICT JUDGE