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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

FEDERAL TRADE COMMISSION,  
Plaintiff,

v.

Civil Action No. 3:11-CV-00055-LRH

IMMIGRATION CENTER, a Colorado Non-Profit Corporation;

IMMIGRATION FORMS AND PUBLICATIONS, INC., a Missouri corporation;

CHARLES DOUCETTE, individually and d/b/a TELESTAFFING, IMMIGRATION FORMS AND SERVICES, and IMMIGRATION FORM PROCESSING;

DEBORAH STILSON a/k/a DEBORAH MALMSTROM, individually and d/b/a LIBERTY LEGAL SERVICES, AMERICAN LEGAL SERVICES, and NINNER;

ALFRED BOYCE, individually and d/b/a MAYDENE WEB SERVICES;

**STIPULATED FINAL JUDGMENT  
AND ORDER FOR PERMANENT  
INJUNCTION AND OTHER  
EQUITABLE RELIEF AS TO  
DEFENDANTS IMMIGRATION  
CENTER, CHARLES DOUCETTE,  
AND DEBORAH STILSON**

1 THOMAS STRAWBRIDGE, individually  
2 and as an officer of IMMIGRATION  
FORMS AND PUBLICATIONS, INC.;

3 ROBIN MEREDITH, individually and as an  
4 officer of IMMIGRATION FORMS AND  
PUBLICATIONS, INC.;

5 THOMAS LAURENCE, individually; and

6 ELIZABETH MEREDITH, individually,

7 Defendants.

8  
9  
10 **STIPULATED FINAL JUDGMENT AND ORDER FOR  
PERMANENT INJUNCTION AND MONETARY RELIEF**

11 Plaintiff Federal Trade Commission (“FTC”) filed its Complaint for a permanent  
12 injunction and other equitable relief in this matter pursuant to Section 13(b) of the Federal Trade  
13 Commission Act (“FTC Act”), 15 U.S.C. § 53(b). The FTC and Defendants Immigration Center,  
14 Charles Doucette, and Deborah Stilson stipulate to the entry of this Stipulated Final Judgment  
15 and Order for Permanent Injunction and Other Equitable Relief (“Order”) to resolve all matters  
16 in dispute in this action between them.

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

18 **FINDINGS**

- 19 1. This Court has jurisdiction over the subject matter of this case and all of the  
20 parties pursuant to 15 U.S.C. §§ 45(a) and 53(b), and 28 U.S.C. §§ 1331, 1337(a) and 1345.
- 21 2. Venue is proper in this District under 15 U.S.C. § 53(b) and 28 U.S.C. § 1391(b)  
22 and (c).
- 23 3. The activities of Defendants, as alleged in the Complaint, are “in or affecting  
24 commerce,” as defined in Section 4 of the FTC Act, 15 U.S.C. § 44.
- 25 4. The Complaint states a claim upon which relief may be granted against  
26 Defendants, under Sections 5(a) and 13(b) of the FTC Act, 15 U.S.C. §§ 45(a) and 53(b).
- 27 5. Defendants do not admit any allegations in the Complaint, except for facts  
28 necessary to establish jurisdiction and as otherwise specifically stated in this Order.



1 person on whose behalf a person purchased or agreed to purchase, immigration services from  
2 any Defendant prior to the entry of this Order.

3 5. **“Receiver”** means Aviva Gordon, the temporary receiver appointed in this action.  
4 “Receiver” includes any deputy receivers as may be named by the Receiver.

5 **ORDER**

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

7 IT IS ORDERED that Stipulating Defendants are permanently restrained and enjoined  
8 from providing, or assisting others in providing, immigration services.

9 **II. PROHIBITED BUSINESS ACTIVITIES REGARDING ANY GOODS OR  
10 SERVICES**

11 IT IS FURTHER ORDERED that, in connection with the advertising, marketing,  
12 promotion, offering for sale, or sale of any goods or services, Stipulating Defendants, and their  
13 officers, agents, servants, employees, and attorneys, and all other persons in active concert or  
14 participation with any of them who receive actual notice of this Order by personal service or  
15 otherwise, are permanently restrained and enjoined from:

16 A. Misrepresenting, directly or indirectly, expressly or by implication, their  
17 education, training, or credentials, or that they are qualified or authorized to provide legal advice  
18 or services;

19 B. Misrepresenting, directly or indirectly, expressly or by implication, that they are  
20 part of or affiliated with one or more agencies of the United States government; and

21 C. Misrepresenting, directly or indirectly, expressly or by implication, any material  
22 fact, including but not limited to:

- 23 1. The total cost to purchase, receive, or use the goods or services;
- 24 2. Any material restrictions, limitations, or conditions to purchase, receive,  
25 or use the goods or services;
- 26 3. Any material aspect of the nature or terms of a refund, cancellation,  
27 exchange, or repurchase policy for the goods or services; or
- 28 4. Any material aspect of the performance, efficacy, nature, or central

1 characteristics of the goods or services.

2 **III. MONETARY JUDGMENT**

3 IT IS FURTHER ORDERED that:

4 A. Judgment is entered jointly and severally, as equitable monetary relief: (1) in  
5 favor of the FTC and against Stipulating Individual Defendants, jointly and severally, in the  
6 amount of three million, seven hundred forty-three thousand, six hundred fifty-two U.S. Dollars  
7 and sixty cents (\$3,743,652.60); and (2) in favor of the FTC and against Stipulating Corporate  
8 Defendant in the amount of three million, one hundred forty-one thousand, six hundred sixty-  
9 seven U.S. Dollars, and forty-two cents (\$3,141,667.42);

10 B. Stipulating Defendants shall relinquish and turn over to the Receiver within five  
11 (5) days of entry of this Order all dominion, control, and title to any and all assets of Defendant  
12 Immigration Center, to all vehicles listed on Attachment A to this Order, and to any assets  
13 currently in the possession of the Receiver, except for non-business, personal property of de  
14 minimis value. Upon transfer of such vehicles and other assets, the remainder of the money  
15 judgment shall be suspended subject to the Subsections below and Section IV;

16 C. In the event of any default by the Stipulating Defendants on any obligation  
17 imposed under this Section III, including, but not limited to, the failure to timely and completely  
18 fulfill their payment obligations:

- 19 1. The judgment imposed herein as to Stipulating Defendants will not be  
20 suspended, and the full amount of that Judgment (\$3,743,652.60 as to  
21 Stipulating Individual Defendants and \$3,141,667.42 as to Stipulating  
22 Corporate Defendant) plus interest from the date of entry of this Order  
23 pursuant to 28 U.S.C. § 1961, as amended, less the sum of any amounts  
24 already paid by Stipulating Defendants or other Defendants, shall  
25 immediately become due and payable; and
- 26 2. The FTC shall be entitled to immediately exercise any and all rights and  
27 remedies against Stipulating Defendants and Stipulating Defendants'  
28 assets to collect the full amount of the judgment and interest thereon, less

1 any amounts already paid;

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

16 E. In accordance with 31 U.S.C. § 7701, as amended, Stipulating Defendants are  
17 hereby required, unless they have already done so, to furnish to the FTC their taxpayer  
18 identifying numbers (Social Security Numbers or Employer Identification Numbers), which shall  
19 be used for purposes of collecting and reporting on any delinquent amount arising out of  
20 Stipulating Defendants' relationship with the government. Stipulating Individual Defendants are  
21 each further required, unless they have already done so, to provide the FTC with a clear, legible  
22 and full-size photocopy of a valid driver's license, which will be used for reporting and  
23 compliance purposes;

24 F. Stipulating Defendants relinquish dominion and all legal and equitable right, title,  
25 and interest in all assets transferred pursuant to this Order and shall not seek the return of any  
26 assets;

27 G. Stipulating Defendants agree that the facts as alleged in the Complaint filed in  
28 this action shall be taken as true without further proof in any bankruptcy case or subsequent civil

1 litigation pursuant to this Order, including but not limited to a nondischargeability complaint in  
2 any bankruptcy case. Stipulating Defendants further stipulate and agree that the facts alleged in  
3 the Complaint establish all elements necessary to sustain an action pursuant to Section  
4 523(a)(2)(A) of the Bankruptcy Code, 11 U.S.C. § 523(a)(2)(A), and that this Order shall have  
5 collateral estoppel effect for such purposes; and

6 H. Proceedings instituted under this Section are in addition to, and not in lieu of, any  
7 other civil or criminal remedies that may be provided by law, including any other proceedings  
8 the FTC may initiate to enforce this Order.

#### 9 **IV. RIGHT TO REOPEN**

10 IT IS FURTHER ORDERED that:

11 A. The FTC's agreement to this Order is expressly premised upon the truthfulness,  
12 accuracy, and completeness of Stipulating Defendants' financial condition, as represented in the  
13 Financial Disclosure Statements of Defendants Charles Doucette and Deborah Stilson, dated  
14 February 3, 2011, and the asset deposition testimony of Charles R. Doucette and Deborah Stilson  
15 of July 26, 2011, and exhibits thereto, which contain material information upon which the FTC  
16 relied in negotiating and agreeing to the terms of this Order;

17 B. If, upon motion by the FTC, the Court finds that any Stipulating Defendant failed  
18 to disclose any material asset, materially misrepresented the value of any asset, or made any  
19 other material misrepresentation in or omission from the Stipulating Defendant's financial  
20 statement or supporting documents, then this Order shall be reopened and suspension of the  
21 judgment set forth in Section III shall be lifted as to that Defendant for the purpose of requiring  
22 payment of monetary relief in the amount of three million, seven hundred forty-three thousand,  
23 six hundred fifty-two U.S. Dollars, and sixty cents (\$3,743,652.60) as to Stipulating Individual  
24 Defendants and in the amount of three million, one hundred forty-one thousand, six hundred  
25 sixty-seven U.S. Dollars, and forty-two cents (\$3,141,667.42) as to Stipulating Corporate  
26 Defendant, less the sum of any amounts paid to the FTC pursuant to Section III and any other  
27 payments made by other Stipulating Defendants or other Defendants. *Provided, however,* that,  
28 in all other respects, this Order shall remain in full force and effect, unless otherwise ordered by

1 the Court;

2 C. Any proceedings instituted under this Section shall be in addition to, and not in  
3 lieu of, any other civil or criminal remedies that may be provided by law including, but not  
4 limited to, contempt proceedings, or any other proceedings that the FTC or the United States  
5 might initiate to enforce this Order. For purposes of this Section, Stipulating Defendants waive  
6 any right to contest any of the allegations of the FTC's Complaint.

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

8 IT IS FURTHER ORDERED that Stipulating 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, including by Paragraph VI of this Order; and *provided also* that rather than  
25 destroying them, Stipulating Defendants shall turn over any original birth, marriage or  
26 naturalization certificates, passports and similar original customer documents in their possession,  
27 custody, or control to the Receiver.

28 **VI. RETURN OF CUSTOMER DOCUMENTS AND TERMINATION OF**



1           **RECEIVERSHIP**

2           IT IS FURTHER ORDERED that the appointment of the Receiver pursuant to the  
3 Temporary Restraining Order entered on January 26, 2011, and extended on February 2, 2011,  
4 and the Stipulated Preliminary Injunction entered on March 3, 2011, is hereby continued in full  
5 force and effect except as modified by this Section.

6           The Court directs the Receiver to use her best efforts to identify and contact each  
7 customer and, to the extent feasible, to return original documents in the Receiver's possession,  
8 custody or control that pertain to that customer or the customer's family member, unless the  
9 customer cannot be located or does not request that the documents be returned. "Documents"  
10 include (1) original documents provided by or on behalf of the customer or other person, such as  
11 marriage and birth certificates; (2) any applications, petitions, or other papers filed on the  
12 customer's behalf, but do not include incomplete forms; and (3) any notices or other documents  
13 from the United States Department of Homeland Security or the United States Department of  
14 Justice received by the Defendants on the customer's behalf.

15           The Court directs the Receiver to use reasonable and appropriate measures to protect the  
16 privacy and confidentiality of the original documents and the information contained in such  
17 documents. The Receiver shall, in her sole discretion, after consultation with the FTC,  
18 determine how best to identify and contact customers, determine the necessity and feasibility of  
19 returning original documents to customers, safely and securely return original documents to  
20 customers, and dispose of unreturned documents by shredding or other means that prevent  
21 personally identifiable information from falling into the hands of a third party. With Court  
22 approval, the Receiver may retain other professionals to perform the responsibilities described in  
23 this Section and may expend the assets of the receivership estate for this purpose. The Receiver  
24 and any professionals retained by the Receiver shall not be held liable to any party or person for  
25 any harm resulting from performance of the Receiver's duties under this Section.

26           The Receiver shall complete the liquidation of the assets of the receivership estate and  
27 the return of customer documents. Upon liquidation of the assets of the receivership estate and  
28 the return of customer documents pursuant to this Section, the Receiver shall submit her final

1 report and application for fees and expenses, and upon approval of them by the Court, shall pay  
2 any remaining funds to the FTC. Upon the Court's approval of the Receiver's final report, and  
3 the payment of any remaining funds to the FTC under this Section, the Receivership shall be  
4 terminated.

5 **VII. ORDER ACKNOWLEDGMENTS**

6 IT IS FURTHER ORDERED that each Stipulating Defendant obtain acknowledgments  
7 of receipt of this Order:

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

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

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

22 **VIII. COMPLIANCE REPORTING**

23 IT IS FURTHER ORDERED that Stipulating Defendants make timely submissions to the  
24 FTC:

25 A. One year after entry of this Order, each Stipulating Defendant must submit a  
26 compliance report, sworn under penalty of perjury:

- 27 1. Each Stipulating Defendant must: (a) designate at least one telephone  
28 number and an email, physical, and postal address as points of contact,

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

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

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

24 1. Each Stipulating Defendant must report any change in: (a) any designated  
25 point of contact or (b) the structure of any entity that Stipulating  
26 Defendant has any ownership interest in or directly or indirectly controls  
27 that may affect compliance obligations arising under this Order, including:  
28 creation, merger, sale, or dissolution of the entity or any subsidiary,

1 parent, or affiliate that engages in any acts or practices subject to this  
2 Order.

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

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

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

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

23 **IX. RECORD KEEPING**

24 IT IS FURTHER ORDERED that Stipulating Defendants must create certain records for  
25 twenty (20) years after entry of the Order, and to retain each such record for five (5) years.  
26 Specifically, the Stipulating Corporate Defendant and each Stipulating Individual Defendant for  
27 any business in which that Stipulating Defendant, individually or collectively with any other  
28 Defendants, is a majority owner or directly or indirectly controls, must maintain the following

1 records:

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

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

7 C. Customer files showing the names, addresses, telephone numbers, dollar amounts  
8 paid, and the quantity and description of goods or services purchased;

9 D. Complaints and refund requests, whether received directly or indirectly, such as  
10 through a third party, and any response;

11 E. All records necessary to demonstrate full compliance with each provision of this  
12 Order, including all submissions to the FTC; and

13 F. A copy of each advertisement or other marketing material.

14 **X. COMPLIANCE MONITORING**

15 IT IS FURTHER ORDERED that, for the purpose of monitoring Stipulating Defendants'  
16 compliance with this Order, including the financial representations upon which the judgment  
17 was suspended:

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

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

28 C. The FTC may use all other lawful means, including posing, through its

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

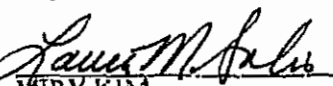
5 **XI. RETENTION OF JURISDICTION**

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

8 **SO STIPULATED AND AGREED:**

9  
10 **PLAINTIFF:**

11  
12 WILLARD K. TOM  
13 General Counsel  
14 ROBERT J. SCHROEDER  
15 Regional Director

16   
17 MURY KIM  
18 LAURA M. SOLIS  
19 Attorneys for Plaintiff  
20 Federal Trade Commission

21 **DEFENDANTS:**

22   
23 CHARLES DOUCETTE  
24 Pro Se

25   
26 DEBORAH STILSON  
27 Pro Se

28 **RECEIVER:**

  
AVIVA Y. GORDON  
Ellis & Gordon

1 | 510 S. 9<sup>th</sup> St.  
2 | Las Vegas, NV 89101  
3 | (702) 385-3727  
4 | Receiver for Immigration Center

5 | **IT IS SO ORDERED.**

6 | DATED this 27th day of December, 2011.



8 | \_\_\_\_\_  
9 | LARRY R. HICKS  
10 | United States District Judge

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**Stipulated Final Judgment and Order  
For Permanent Injunction and Other Equitable Relief  
as to Defendants Immigration Center, Charles Doucette and Deborah Stilson**

**Attachment A**

1. Saturn (model/year unknown)
2. 1988 Fleetwood Motorhome

A handwritten signature in black ink, appearing to read 'Deborah Stilson', with a long horizontal flourish extending to the right.

Deborah Stilson