

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
PEOPLE OF THE STATE OF NEW YORK, by
ANDREW M. CUOMO, Attorney General of the State of
New York,

Plaintiff,

Index No.

-against-

SUMMONS

CLOVER A. PEREZ (AKA)
CLOVER A. RICHARDS (AKA)
CLOVER A. JONES (AKA)
CLOVER A. RICHARD-JONES (AKA) and

PROFESSIONAL SOLUTIONS CONSULTANTS, INC. and

RELIABLE CLERICAL SERVICES INC. d/b/a
RELIABLE IMMIGRATION SERVICES

Defendants.

-----X
TO THE ABOVE-NAMED DEFENDANTS:

YOU ARE HEREBY SUMMONED and required to serve upon plaintiff's attorney an answer to the complaint in this action within twenty (20) days after the service of this summons, exclusive of the day of service, or within thirty (30) days after service is complete if this summons is not personally delivered to you within the State of New York.

In the case of your failure to answer, judgment will be taken against you by default for the relief demanded in the complaint.

Plaintiff designates New York County as the place of trial.

Dated: New York, New York
August 20, 2009

ANDREW M. CUOMO
Attorney General of the State of New York

By:



Alphonso B. David
Bureau Chief

Spencer Freedman
Counsel

Elizabeth De León
Assistant Deputy Counselor

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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
PEOPLE OF THE STATE OF NEW YORK, by
ANDREW M. CUOMO, Attorney General of the State of
New York,

Plaintiff,

**VERIFIED
COMPLAINT**

-against-

CLOVER A. PEREZ (AKA)
CLOVER A. RICHARDS (AKA)
CLOVER A. JONES (AKA)
CLOVER A. RICHARD-JONES (AKA) and

Index No.

PROFESSIONAL SOLUTIONS CONSULTANTS, INC. and

RELIABLE CLERICAL SERVICES INC. d/b/a
RELIABLE IMMIGRATION SERVICES

Defendants.

-----X
The People of the State of New York, by its attorney, ANDREW M. CUOMO, Attorney
General of the State of New York, respectfully allege, upon information and belief:

PRELIMINARY STATEMENT

1. Pursuant to New York Executive Law § 63(12) and § 290 *et seq.*; New York
General Business Law (“GBL”) Article 22-A §§ 349 and 350, and Article 28-C § 460-a *et seq.*
 (“New York State Immigrant Assistance Services Law”); New York Judiciary Law § 478; Title 8
of the Administrative Code of the City of New York (“New York City Human Rights Law”) and
Title 20 of the Administrative Code of the City of New York § 20-770 *et seq.* (“New York City
Immigration Service Provider Law”), plaintiff, the People of the State of New York, by Andrew

M. Cuomo, Attorney General of the State of New York (“Plaintiff”) brings this action against Clover A. Perez, a.k.a. Clover A. Richards, a.k.a. Clover A. Richards-Jones, a.k.a. Clover A. Jones, Professional Solutions Consultants, Inc., and Reliable Clerical Services Inc. d/b/a Reliable Immigration Services (collectively referred to as “Defendants”), for repeatedly engaging in discriminatory, deceptive, fraudulent and illegal business practices, including the unauthorized practice of the law in New York State, in connection with providing immigration-related services to New York State consumers. Plaintiff seeks injunctive relief, restitution, damages, penalties and costs against Defendants.

2. Defendants operate several businesses that provide various services, including providing immigration services to immigrants in New York State. In providing these immigration services Defendants, who are not attorneys admitted to practice law, improperly provide and represent to provide legal advice to immigrants on a wide range of complex immigration-related matters.

3. Defendants’ illegal conduct has caused numerous immigrants to pay substantial fees for incorrect “legal” advice that has inflicted and may inflict in the future permanent damage to their immigration status in the United States.

4. Unless enjoined, Defendants will continue to engage in this conduct and will continue to cause substantial injury to New York residents.

JURISDICTION AND VENUE

5. This Court has jurisdiction over this action pursuant to New York Executive Law § 63(12), which authorizes the Attorney General to seek injunctive relief, restitution, and damages against any person that engages in repeated fraud or illegality in the conduct of

business.

6. Further, GBL Article 22-A, § 349 empowers the Attorney General to seek injunctive relief, restitution, and civil penalties against any person who engages in deceptive acts and practices in the conduct of business.

7. Similarly, GBL Article 28-C, § 460-h empowers the Attorney General to seek injunctive relief, restitution and civil penalties against any person who violates the provisions of the New York State Immigrant Assistance Services Law, without requiring proof that any person has, in fact, been injured or damaged thereby.

8. In addition, New York Judiciary Law § 476-a, authorizes the Attorney General to bring an action for the unlawful practice of the law.

9. The Court also has jurisdiction over this action pursuant to its general jurisdiction under the New York Constitution, Art. VI, § 7, and New York Judiciary Law § 140-b.

10. Venue is proper in this county pursuant to New York CPLR § 503(a) because the Attorney General maintains an office in New York County.

PARTIES

11. Plaintiff, the People of the State of New York, is represented by its chief legal officer, Andrew M. Cuomo, Attorney General of the State of New York, who brings this action pursuant to the authority granted him under New York Executive Law § 63(1) and (12), GBL §§ 349 and 460-h, and New York Judiciary Law § 476-a.

12. Defendant Clover A. Perez (“Defendant Perez”) is an individual who resides in New York and conducts several businesses at 193-10 Linden Boulevard and 180-23 Linden Boulevard, St. Albans, New York under the names Professional Solutions Consultants, Inc. and

Reliable Clerical Services Inc. d/b/a Reliable Immigration Services.

13. Defendants Professional Solutions Consultants, Inc. and Reliable Clerical Services Inc. are corporations based in New York and registered as such with the New York State Department of State.

14. Defendants are primarily engaged in the business of providing services, for a fee, to individuals who reside in immigrant communities in New York City, including, but not limited to, immigration services.

15. The Attorney General has provided Defendants with pre-litigation notice pursuant to GBL § 349(c).

FACTUAL BACKGROUND

16. The Attorney General commenced this action upon learning that Defendants engage in unlawful business practices, including the unauthorized practice of the law, in representing individuals in immigration-related legal filings and proceedings before the United States Citizenship and Immigration Services (“USCIS”).

17. New York State law regulates the conduct of businesses and specifically prohibits businesses from engaging in fraudulent and deceptive practices in the conduct of any business, trade or commerce or in the furnishing of any service. In violation of the law, Defendants repeatedly misrepresent to members of the public their ability and qualifications to provide legal services.

State Law Regulating the Practice of Law

18. New York State law expressly prohibits non-lawyers from providing legal advice to protect citizens against dangers of legal representation and advice given by persons not

trained, examined and licensed for such work. Specifically, Judiciary Law § 478 makes it unlawful for any unlicensed person to practice or appear as an attorney-at-law or as an attorney and counselor-at-law for a person in a court of record in this state, or to furnish attorneys or counsel or an attorney and counsel to render legal services, or to hold himself out to the public as being entitled to practice law.

19. The law not only prohibits non-lawyers from representing clients, but also prohibits non-lawyers from conveying the impression that they are legal practitioners of law or are qualified to provide legal services.

State Law Governing Immigrant Assistance Services

20. New York State residents seeking assistance in immigration matters may retain the services of a licensed attorney or, alternatively, seek out the services of non-attorneys, also known as “immigrant assistance service providers.”

21. Immigrant assistance service providers are regulated by GBL §§ 460-a through 460-j. The law seeks to prevent individuals from preying on the immigrant community by claiming to have the ability or authorization to handle immigration matters and to regulate a practice that had been wholly unsupervised and rife with abuse.

22. Immigrant communities are often targeted by, and find themselves at the mercy of, individuals who are not qualified to represent them, with little or no recourse for the severe consequences they often face as a result. These practices are particularly egregious because, since immigration cases can take years to process, the consequences of an immigration service provider’s mistakes or fraud may not be apparent or detected until it is too late to remedy the significant negative impact to individuals and families. The law is designed to protect

individuals by ensuring that those assisting them in their immigration matters are knowledgeable, qualified, and authorized to perform services.

23. As such, the statute allows non-attorneys to provide only clerical services, such as completing immigration forms based on information provided by the immigrant consumer, notarizing documents if licensed to do so, translating documents, and mailing documents on behalf of consumers to the required government agencies for processing. Further, state law requires providers to comply with certain advertising, signage and surety requirements, as well as to provide consumers with written contracts.

24. Immigrant assistance service providers are legally prohibited from providing legal services including, but not limited to, giving legal advice to consumers on what form of immigration relief they should be seeking and what immigration forms to complete and file, or appearing in immigration court or before officials with the USCIS. The reason behind this limitation is that such advice and representation often requires extensive knowledge of complex immigration laws and the ability to apply such laws to fact-specific individual cases.

Federal Law Governing Immigration Services

25. For these same reasons, similar federal regulations promulgated by the Department of Homeland Security (Code of Federal Regulations, Title 8, Aliens and Nationality) governing this issue emphasize that providers are limited to typing up forms completed by clients, and may not engage in personal legal assistance in conjunction with their business activities.

26. Federal law also regulates who may represent immigrants in immigration court and who may appear on behalf of immigrants before immigration authorities such as the USCIS.

The USCIS requires that representatives of immigrants complete and file a “Notice of Entry of Appearance as Attorney or Representative” (Form G-28). Only attorneys and accredited representatives of organizations recognized by the United States Board of Immigration Appeals (“BIA”) as defined in 8 C.F.R. §§ 103.2 and 292.1, may file Form G-28.

27. An individual can obtain accreditation only through an organization recognized by the BIA. The organization must submit documentation showing that the individual seeking accreditation has knowledge, information and experience in immigration and nationality law and procedure and must have an attorney actually supervising these matters. Further, the recognized organization must certify through the application process that the individual seeking accreditation, among other things, is a person of good moral character and will charge or accept only a nominal fee set by the organization through which the individual gains their accreditation.

The Attorney General’s Investigation

28. The Attorney General’s Office received complaints that Defendants are engaged in unlawful business practices, including the unauthorized practice of the law, in representing individuals in immigration-related legal filings and proceedings before the USCIS.

29. As a result, the Attorney General commenced an investigation of Defendants’ policies, procedures and practices in providing services to the public by, among other things, questioning Defendant Perez under oath and reviewing Defendants’ documents, including a number of client files.

30. Defendant Perez is officially registered through her corporations Defendants Professional Solutions Consultants, Inc. and Reliable Clerical Services Inc. to provide general business services in New York State, such as providing notary services and assisting individuals

in completing immigration forms and other documents for submission to the federal immigration agencies.

31. Defendant Perez is not, however, licensed to practice law in the State of New York, nor is she authorized or accredited to represent anyone on immigration related matters before any state or federal agency, including the USCIS.

32. Although in print advertising Defendants state that they are not lawyers, the evidence reflects that Defendants in fact provide and/or represent that they provide legal advice and services to immigrants in complex matters such as political asylum; matters that undoubtedly require extensive knowledge of immigration laws. In fact, Defendant Perez has represented to individuals that she can represent them in proceedings before the USCIS and Immigration Courts; a task that only a licensed lawyer or an accredited representative could perform. Defendants are neither.

33. As a result of the above representations, individuals paid Defendants advance fees for these services of up to \$2,500, more than Defendants are authorized to charge under the law as non-lawyers and unaccredited representatives. Further, their fees are approximately 16 times more than what they represented their charges to be after their unlawful conduct was discovered. From 2006 to 2008, Defendants collected more than \$90,000 in fees for the provision of immigration services.

34. In addition, Defendant Perez repeatedly filed USCIS Form G-28 without being either an attorney or a representative of an organization accredited by the BIA to appear before the USCIS and Immigration Court. As of March 24, 2008, Defendants had filed Form G-28 in connection with 466 applications or petitions.

35. Further, Defendants repeatedly failed to complete immigration forms correctly and failed to include required documentation. As a result, immigrants frequently received letters from the immigration authorities informing them that their immigration application could not be processed because it lacked the necessary information and/or documentation. Consequently, their applications faced numerous and unnecessary delays due to Defendants' actions.

36. The USCIS notified Defendant Perez, via certified mail, of her ineligibility to practice before the USCIS. Defendants denied engaging in unlawful conduct, claiming that they were only providing clerical services. Yet, Defendants continued providing legal services after USCIS put Perez on notice of her ineligibility to represent immigrants before immigration authorities such as the USCIS.

Violations of the Law

37. The Attorney General's investigation confirmed that, in violation of GBL § 349, Defendants engaged in fraudulent and deceptive business practices in providing immigration-related services, including misrepresenting their ability and qualifications to provide legal advice and represent clients in legal proceedings.

38. The investigation revealed that, in violation of Judiciary Law § 478, Defendant Perez practiced and appeared as an attorney-at-law without being admitted and registered. Further, the investigation confirmed that, in violation of GBL § 460-e, Defendants engaged in the unauthorized practice of the law by advising individuals in immigration matters such as instructing individuals on which immigration forms to complete and file with the immigration authorities in order to obtain a certain immigration benefit, and determining and advising individuals on the best course of action for their immigration matters. In fact, Defendant Perez

did file USCIS Form G-28 for each individual that used her immigration assistance services and filed immigration forms with the USCIS in violation of the law.

39. The Attorney General's investigation also revealed that Defendants failed to comply with the requirements of providing immigrant assistance services as required by GBL §§ 460-b through 460-g.

40. Specifically, Defendants repeatedly failed to provide individuals with written contracts that include certain disclosures and information required by GBL § 460-b, including an itemization of all services to be provided and its fees, and informing individuals of their right to cancel the contract within three business days without any penalties or fees. Instead, Defendants state in their contracts that customers will be charged 25% of the deposit already paid, even if customers cancel the contract within three business days.

41. Defendants also failed to display signs in their place of business, as required by GBL § 460-c: (a) alerting individuals of their right to cancel the contract within three business days without penalty; and (b) alerting individuals that Defendants cannot provide legal advice and are not authorized to represent individuals before immigration authorities.

42. Defendants also failed to include in their advertisement the language required by GBL § 460-d, including alerting individuals that Defendants cannot provide legal advice and are not authorized to represent individuals before immigration authorities.

43. Defendants also failed to secure a surety bond payable to the People of the State of New York, and in an amount determinable by the income received from providing immigration services, as required by GBL § 460-g.

44. Defendants also failed to provide individuals with copies of every document filed

on their behalf with immigration authorities as required by GBL § 460-e (7).

45. Similarly, based on these omissions, Defendants violated the provisions of the New York City Immigration Service Provider Law that mirror GBL §§ 460-a through 460-j.

46. Defendants also violated New York's civil rights laws by illegally seeking to defraud immigrants based on their alienage, citizenship status and national origin.

47. Based on the foregoing, Defendants violated New York General Business Law, New York Judiciary Law, and New York Executive Law.

48. Unless enjoined, Defendants will continue to engage in this fraudulent and illegal conduct and will continue to cause substantial injury to New York State residents.

FIRST CAUSE OF ACTION:
NEW YORK EXECUTIVE LAW § 63(12)
FRAUD

49. New York Executive Law § 63(12) prohibits fraud in the conduct of any business, trade or commerce.

50. By reason of the conduct alleged above, Defendants are repeatedly engaging in fraudulent acts and practices in connection with the transactions in violation of New York Executive Law § 63(12).

SECOND CAUSE OF ACTION:
NEW YORK GENERAL BUSINESS LAW § 349
DECEPTIVE ACTS AND PRACTICES

51. New York General Business Law § 349 prohibits “deceptive acts or practices in the conduct of any business, trade or commerce or in the furnishing of any service” in New York State.

52. By acting as immigration service providers, Defendants conduct “business” or provide a “service” within the meaning of New York General Business Law § 349.

53. Defendants engage in one or more of the following deceptive acts and practices in connection with these immigration service transactions:

- a. misrepresenting to the public that Defendants can represent individuals seeking to file applications before the USCIS; and
- b. misrepresenting to the public that Defendant Perez is an expert in immigration matters authorized and qualified to provide legal advice.

54. By reason of the conduct alleged above, Defendants are engaging in deceptive conduct in violation of New York General Business Law § 349.

THIRD CAUSE OF ACTION:
PURSUANT TO NEW YORK EXECUTIVE LAW § 63(12) - ILLEGALITY
VIOLATIONS OF NEW YORK GENERAL BUSINESS LAW § 349
DECEPTIVE ACTS AND PRACTICES

55. A violation of state law constitutes illegality within the meaning of New York Executive Law § 63(12) and is actionable thereunder when persistent or repeated.

56. Defendants’ repeated and persistent violations of GBL Article 22-A, § 349 are thus violations of New York Executive Law § 63(12).

57. By reason of the conduct alleged above, Defendants are repeatedly and persistently engaging in illegality in violation of New York Executive Law § 63(12).

FOURTH CAUSE OF ACTION:
NEW YORK JUDICIARY LAW § 478
UNAUTHORIZED PRACTICE OF THE LAW

58. New York Judiciary Law § 478 prohibits individuals from practicing or appearing as attorneys-at-law without being admitted and registered.

59. By advising individuals on immigration matters such as instructing individuals on which immigration forms to complete and file with the immigration authorities in order to obtain a certain immigration benefit, and advising individuals on the purported best course of action for their immigration matters, Defendant Perez repeatedly and persistently violated New York Judiciary Law § 478.

60. By filing Form G-28 for each one of her customers, Defendant Perez repeatedly and persistently violated New York Judiciary Law § 478.

61. By reason of the conduct alleged above, Defendant Perez is engaging in the unauthorized practice of the law in violation of New York Judiciary Law § 478.

FIFTH CAUSE OF ACTION:
PURSUANT TO NEW YORK EXECUTIVE LAW § 63(12) - ILLEGALITY
VIOLATIONS OF NEW YORK JUDICIARY LAW § 478
UNAUTHORIZED PRACTICE OF THE LAW

62. A violation of state law constitutes illegality within the meaning of New York Executive Law § 63(12) and is actionable thereunder when persistent or repeated.

63. Defendant Perez's repeated and persistent violations of New York Judiciary Law § 478 are thus violations of New York Executive Law § 63(12).

64. By reason of the conduct alleged above, Defendants are repeatedly and persistently engaging in illegality in violation of New York Executive Law § 63(12).

SIXTH CAUSE OF ACTION:
NEW YORK GENERAL BUSINESS LAW §§ 460-a through 460-j
IMMIGRANT ASSISTANCE SERVICE PROVIDERS

65. New York General Business Law, Article 28-C (§§ 460-a through 460-j) regulates the conduct of immigration service providers in New York State. The law defines "immigrant service providers" as any person "providing assistance, for a fee, or other compensation, to

persons who have [...] come to the United States [...], in relation to any proceeding, filing or action affecting the non-immigrant, immigrant or citizenship status of a person which arises under the immigration and nationality law, executive order or presidential proclamation, or which arises under actions or regulations of the [USCIS, United States Department of Labor, or the United States Department of State].”

66. By failing to provide written contracts to their clients, Defendants repeatedly and persistently violate GBL § 460-b.

67. By failing to post signs where Defendants provide immigration services, indicating that they are not attorneys nor are they authorized to represent individuals before the USCIS, Defendants repeatedly and persistently violate GBL § 460-c.

68. By advising each immigrant on the process to follow and forms required to adjust their immigration status, Defendants repeatedly and persistently violate GBL § 460-e.

69. By failing to retain client documents for three years, Defendants repeatedly and persistently violate GBL § 460-f.

70. Defendants fail to comply with the surety requirement provided by GBL § 460-g.

71. By reason of the conduct alleged above, Defendants are engaging in illegal conduct in violation of New York General Business Law §§ 460-b through 460-g.

SEVENTH CAUSE OF ACTION:
PURSUANT TO NEW YORK EXECUTIVE LAW § 63(12) - ILLEGALITY
VIOLATIONS OF NEW YORK GENERAL BUSINESS LAW §§ 460-a through 460-g
IMMIGRANT ASSISTANCE SERVICE PROVIDERS

72. A violation of state law constitutes illegality within the meaning of New York Executive Law § 63(12) and is actionable thereunder when persistent or repeated.

73. Defendants’ repeated and persistent violations of GBL Article 28-C, § 460-b

through 460-g are thus violations of New York Executive Law § 63(12).

74. By reason of the conduct alleged above, Defendants are repeatedly and persistently engaging in illegality in violation of New York Executive Law § 63(12).

EIGHTH CAUSE OF ACTION:
PURSUANT TO NEW YORK EXECUTIVE LAW § 63(12)
VIOLATIONS OF NEW YORK CITY IMMIGRATION SERVICE PROVIDER LAW
§§ 20-770 through 20-780

75. Title 20 of the Administrative Code of the City of New York §§ 20-770 through 20-780 (“NYC Immigration Service Provider Law”) regulates the conduct of immigration assistance service providers in New York City.

76. Defendants repeatedly and persistently violate NYC Immigration Service Provider Law § 20-771(e) by advising each immigrant on the process to follow and forms required to adjust their immigration status.

77. By failing to provide written contracts to their clients in English and in a language that they would understand, Defendants repeatedly and persistently violate NYC Immigration Service Provider Law § 20-772.

78. By failing to post signs where Defendants provide immigration services, indicating that they are not attorneys nor are they authorized to represent individuals before the USCIS, Defendants repeatedly and persistently violate NYC Immigration Service Provider Law § 20-773.

79. By failing to include in any advertisement the required language that highlights Defendants status as non-attorneys, Defendants repeatedly and persistently violate NYC Immigration Service Provider Law § 20-774.

80. By failing to retain client documents for three years, Defendants repeatedly and

persistently violate NYC Immigration Service Provider Law § 20-775.

81. By reason of the conduct alleged above, Defendants are engaging in illegal conduct in violation of NYC Immigration Service Provider Law §§ 20-770 through 20-780.

82. By their actions in violation of NYC Immigration Service Provider Law §§ 20-770 through 20-780, Defendants are engaging in repeated and persistent illegality in violation of New York Executive Law § 63(12).

NINTH CAUSE OF ACTION:
PURSUANT TO NEW YORK EXECUTIVE LAW § 63(12)
VIOLATIONS OF NEW YORK STATE HUMAN RIGHTS LAW
DISCRIMINATION BASED ON NATIONAL ORIGIN

83. New York State Human Rights Law § 296(2)(a) prohibits discrimination in public accommodations based on national origin.

84. In their capacity as immigration service providers, Defendants Professional Solutions Consultants, Inc. and Reliable Clerical Services Inc. are places of public accommodation and illegally seek to defraud immigrants based on their national origin. Similarly, Defendant Perez, as an agent of Defendants Professional Solutions Consultants, Inc. and Reliable Clerical Services Inc. and their main provider of immigration services, targets immigrants based on their national origin.

85. By reason of the conduct alleged above, Defendants are repeatedly engaging in discrimination in connection with the transactions in violation of New York State Human Rights Law § 296(2)(a).

86. By their actions in violation of New York State Human Rights Law § 296(2)(a), Defendants are engaging in repeated and persistent illegality in violation of New York Executive Law § 63(12).

TENTH CAUSE OF ACTION:
PURSUANT TO NEW YORK EXECUTIVE LAW § 63(12)
VIOLATIONS OF NEW YORK CITY HUMAN RIGHTS LAW
DISCRIMINATION BASED ON
ALIENAGE, CITIZENSHIP STATUS AND NATIONAL ORIGIN

87. Title 8 of the Administrative Code of the City of New York (“New York City Human Rights Law”) § 8-107(4) prohibits discrimination in public accommodations based on national origin, citizenship status and alienage.

88. In their capacity as immigration service providers, Defendants Professional Solutions Consultants, Inc. and Reliable Clerical Services Inc. are places of public accommodation and illegally seek to defraud Latin American, Caribbean and/or West Indian immigrants based on their national origin, citizenship status and alienage. Similarly, Defendant Perez, as an agent of Defendants Professional Solutions Consultants, Inc. and Reliable Clerical Services Inc. and their main provider of immigration services, targets immigrants based on their national origin, citizenship status and alienage.

89. By reason of the conduct alleged above, Defendants are repeatedly engaging in discrimination in connection with the transactions in violation of New York City Human Rights Law § 8-107(4).

90. By their actions in violation of New York City Human Rights Law § 8-107(4), Defendants are engaging in repeated and persistent illegality in violation of New York Executive Law § 63(12).

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that a judgment and order be issued:

A. Permanently enjoining Defendants, their employees, agents, successors, heirs and assigns, directly or indirectly, from engaging in the fraudulent and illegal practices alleged therein;

B. Permanently enjoining Defendants from engaging in the business of providing immigration services;

C. Permanently enjoining Defendants from engaging in the unauthorized practice of the law;

D. Directing Defendants to provide an accounting of each immigration assistance service transaction;

E. Directing Defendants to pay restitution and compensatory damages to the immigrants harmed by their illegal conduct;

F. Directing Defendants to pay a civil penalty of \$7,500 to the State of New York for each violation of General Business Law Article 28-C pursuant to GBL § 460-h;

G. Directing Defendants to pay a civil penalty of \$5,000 to the State of New York for each violation of General Business Law Article 22-A pursuant to GBL § 350-d;

H. Awarding Plaintiff the costs of this proceeding, including \$2,000 in additional costs against Defendants pursuant to CPLR § 8303(a)(6); and

I. Granting Plaintiff such other and further relief as this Court finds appropriate and equitable, including injunctive and declaratory relief as may be required in the interests of justice.

Dated: New York, New York
August 20, 2009

ANDREW M. CUOMO
Attorney General of the State of New York

By:



Alphonso B. David
Bureau Chief

Spencer Freedman
Counsel

Elizabeth De León
Assistant Deputy Counselor

Vilda Vera Mayuga
Assistant Attorney General

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Civil Rights Bureau
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VERIFICATION

STATE OF NEW YORK)

COUNTY OF NEW YORK) ss.:

ALPHONSO B. DAVID, being duly sworn, deposes and says:

I am the Bureau Chief in the office of Andrew M. Cuomo, Attorney General of the State of New York, and am duly authorized to make this verification.

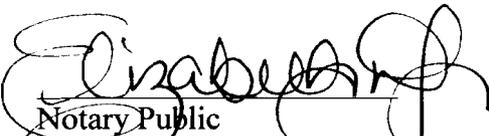
I have read the foregoing complaint and know the contents thereof, which are to my knowledge true, except as to those matters stated to be alleged on information and belief, and to these matters I believe them to be true. The grounds of my belief as to all matters stated upon information and belief are investigative materials contained in the files of the Attorney General's office.

The reason this verification is not made by plaintiff is that plaintiff is a body politic and the Attorney General is its duly authorized representative.



ALPHONSO B. DAVID

Sworn to before me this
20th day of August, 2009



Notary Public

ELIZABETH DE LEÓN
Notary Public - State of New York
No. 02DE6146784
Qualified In New York County
Commission Expires May 22, 2010