

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

-----X  
PEOPLE OF THE STATE OF NEW YORK, by  
ERIC T. SCHNEIDERMAN, Attorney General of the State  
of New York,

Petitioner,

-against-

Index No. 402111/09/2004

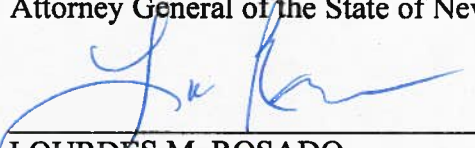
VINCENT I. GONZALEZ, D/B/A GOD-MAN  
SOCIETY CLUB, INC

Respondent.

Pursuant to Executive Law § 63(12)  
-----X

**PETITIONER'S MEMORANDUM OF LAW IN SUPPORT OF  
A MOTION TO PUNISH FOR CIVIL AND CRIMINAL CONTEMPT**

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### **PRELIMINARY STATEMENT**

The New York State Attorney General ("NYAG") is before this Court, on behalf of Petitioner, the People of the State of New York, seeking to hold Respondent Vincent I. Gonzalez ("Respondent") in civil and criminal contempt for falsely representing himself to be an attorney and fraudulently offering immigration services to individuals seeking support with regard to the immigration status adjustment process. On July 2, 2010 this Court published an Order and Judgment explicitly prohibiting Respondent from engaging in any fraudulent, deceptive, or illegal acts and practices in connection with providing immigration services. Specifically, this Court enjoined Respondent from providing immigration services and from engaging in the unauthorized practice of law. As described in detail *infra*, Respondent has repeatedly and unabashedly defied this Court's previous order.

From the date of the Court's issuance of the Order and Judgement, Respondent has engaged in several actions which support Petitioner's charges of criminal and civil contempt. As of the filing of this action, Respondent has not made any payments to the \$6,765,871.97 money judgment as required by the 2010 Order and Judgment. Respondent has also filed approximately 527 DHS Form G-28 Notice of Appearance as Attorney or Accredited Representative with United States Citizenship and Immigration Services ("USCIS"), including eight appearance notices filed in 2017. In December 2016 and January 2017, Respondent purported to provide legal counsel and immigration-related services to two undercover investigators from the NYAG who posed as potential clients. Finally, as reported by two complainants to the NYAG, Respondent provided immigration-related services to one named client in 2015 and another named client between 2006 to 2011.

Under New York law, civil contempt has four elements. First, there must be a lawful order of the court which clearly expresses an unequivocal mandate that was in effect. Second, the moving party must establish with reasonable certainty that the non-moving party disobeyed the order. Third, the non-moving party must have had knowledge of the order. And lastly, the movant must demonstrate that the non-moving party prejudiced, in some way, a party to the litigation. For an action for criminal contempt, the movant must demonstrate that the non-moving party willfully disobeyed the lawful court order.

The Respondent satisfies all of the above listed elements. The 2010 Order and Judgment is a lawful order of the court that clearly express an unequivocal mandate that was in effect. The Respondent knew of the order, as evidenced by the fact that Petitioner personally served Respondent with a true copy of the 2010 Order and Judgment. Respondent has continued to provide unauthorized legal services in violation of the 2010 Order and Judgment. And Respondent has prejudiced Petitioner by impeding the NYAG's mandate to protect New Yorkers from being defrauded and victimized. Finally, Respondent has displayed willful disobedience of the 2010 Order and Judgment, which raises his conduct to the level of criminal contempt.

This memorandum of law is submitted in support of the NYAG's motion for an order:

- a) finding Respondent in civil and criminal contempt of court pursuant to Judiciary Law § 7503(3);
- b) imposing a fine of \$100,000.00 for contemptuous conduct;
- c) punishing Respondent with 30 days of incarceration for criminal contempt;
- d) punishing Respondent with three months of incarceration for civil contempt;
- e) directing Respondent to fully comply with the 2010 Order and Judgment;

- f) directing Respondent to provide an accounting of each consumer transaction that Respondent has completed since July 2, 2010 for any immigration services rendered, including the names and addresses of the consumers with whom the Respondent has conducted business, the amount of money involved in each transaction, and all necessary documentation concerning the transactions, within ten days of service of the order and judgment;
- g) directing Respondent to provide restitution and damages to consumers who have registered complaints with the NYAG as well as any additional injured consumers identified after the NYAG has investigated the account information provided by Respondent pursuant to this Court's endorsement of subsection f of this instant paragraph;
- h) authorizing the NYAG to docket as an order and judgment issued by the Court on this motion directing the payment of money by Respondent;
- i) awarding Petitioner \$100.00 in motion costs;
- j) changing the caption of this matter by substituting the name of previous Attorney General Andrew Cuomo with that of the current Attorney General Eric T. Schneiderman as counsel for the Petitioner; and
- k) awarding Petitioner such other and further relief as the Court deems just and proper.

### **STATEMENT OF FACTS**

#### **A. The NYAG's 2008-2009 Investigation of Respondent Vincent I. Gonzalez**

As set forth more fully in the Affirmation of Jose Nieves, dated November 30, 2017 (hereinafter "Nieves Aff."), in 2008 the NYAG began investigating a complaint that Respondent was engaged in lawful business practices, including the unauthorized practice of the law, in

representing individuals in immigration related legal filings and proceeding before USCIS. On February 10, 2009, and after the NYAG had commenced its investigation, Respondent's company Immigration Community Service entered into a Consent Judgment and Order with the New York City Department of Consumer Affairs ("DCA") for violation of the New York City Immigration Service Provider Law (which mirrors the NYS GBL § 460-a *et seq.*). See Exhibit CC, Consent Judgment/Order between Immigration Community Service, Violation No. 0L5178758, dated February 9, 2009. The Consent Judgment and Order with DCA prohibited Immigrant Community Service Corporation from giving legal advice concerning an immigration matter, or otherwise engaging in the practice of law, to include selecting or recommending immigration forms for consumers to file, advising consumers as to their likelihood of obtaining an immigration status, and/or advising consumers how to resolve an immigration matter. Id. p. 3. In the Consent Judgment/Order, Respondent was specifically named as Immigration Community Service Corporation's employee responsible for ensuring compliance with this judgment. Id. p. 14. In addition, Respondent is a signatory of the Consent Judgment/Order and is clearly identified as the Owner/CEO of Immigration Community Service Corporation. Id. p. 16. However, NYAG received information that Respondent was continuing to defraud immigrant clients and engage in the unauthorized practice of the law even after Respondent entered into the Consent Judgment and Order with DCA. Consequently, by letter dated June 4, 2009, the NYAG notified Respondent of the NYAG's intent to commence litigation against the Respondent and his business Immigration Community Service Corporation. See Ex. A, NYAG Notice of Intention to Sue letter.



On August 20, 2009, Petitioner commenced a special proceeding against Respondent pursuant to New York State Executive Law § 63(12) and New York State General Business Law (“GBL”) Article 22-A. See Ex. B, NYAG Summons and Verified Complaint Index No. 402111/09.

On September 12, 2009, the NYAG personally served Respondent with the Summons and Verified Complaint under Index No. 402111/09. See Ex. C, Affidavit of Service of Summons and Verified Complaint dated September 15, 2009. The Petitioner asserted in its Verified Complaint, and allied papers, that Respondent—through his immigration services business located at 1806 Amsterdam Avenue, New York, New York—repeatedly engaged in discriminatory, deceptive, fraudulent and illegal business practices against New York consumers, including the unauthorized practice of law in New York State. Id. at 1–3.

On February 19, 2010, the NYAG filed an Application seeking an Order to Show Cause for Default Judgment. See Ex. D, NYAG Application for Order to Show Cause for a Default Judgment and Memorandum of Law in Support of an Order to Show Cause for Default Judgment, dated February 18, 2010. In the Application for Order to Show Cause for a Default Judgment, Petitioner sought a court order enjoining Respondent from engaging in such practices. Id. at 5. On March 2, 2010, Respondent was duly served with notice of the Order to Show Cause Request for Judicial Intervention and supporting documentation. See Ex. E, Affidavit of Service of Order of Show Cause Request for Judicial Intervention.

#### **B. The 2010 Judgment and Order Against Respondent**

On March 30, 2010, the Honorable Justice Debra James held a hearing to consider the NYAG application by show cause order for default judgment against Respondent. See Ex. F, Transcript of the March 30, 2010, Special Proceeding for NYAG Application for Show Cause

Order Part 59–Supreme Court of the State of New York, County of New York, Index No. 402111/09. Justice James granted the NYAG motion for a default judgment against Respondent and found that the amount sought was calculable based on the papers thereby negating the need for a hearing on damages pursuant to an inquest. Id. at 7.

On July 2, 2010, this Court issued an Order and Judgment (“the 2010 Order and Judgment”) against Respondent that permanently enjoined Respondent from engaging in: (1) the fraudulent and illegal practices alleged in the Verified Complaint; (2) the business of providing immigration services; and (3) the unauthorized practice of law. See Ex. G, Order and Judgment dated July 2, 2017. Justice James further directed Respondent to pay the following:

- \$127,635 in restitution and compensatory damages to the individuals harmed by his illegal conduct;
- a civil penalty of \$1,845,000 to the State of New York for 246 violations of GBL Article 28-C pursuant to GBL § 460-h;
- another civil penalty of \$4,275,000 to the State of New York for 855 violations of GBL Article 22-A pursuant to GBL §350-d; and
- the costs of the judicial proceeding, including \$2,000 in additional costs pursuant to CPLR § 8303(a)(6). Id.

The NYAG filed the 2010 Order and Judgment with the New York County Clerk’s office on July 14, 2010. Id. On August 6, 2010, Respondent was personally served with the Court’s Order and Judgment with Notice of Entry. See Ex. H, Affidavit of Service of Order and Judgment with Notice of Entry Index No. 402111/09.

### **C. Respondent’s Violation of the 2010 Order and Judgment**

In 2015, the NYAG received a complaint from two individuals alleging that Respondent defrauded them when Respondent provided legal advice and promised to perform other services in connection with one complainant's criminal case and another complainant's immigration matters. According to the complainants' information, Respondent was operating under the company name "God-Man Society Club Inc." ("GMSC"), located at 930 Grand Concourse, Suite 1A, Bronx, NY 10451. On October 12, 2015, the NYAG researched GMSC on the internet and discovered GMSC openly offered legal services to include visa, criminal law and civil law services. GMSC further boasted on its website that "since being established in 2001, we have provided the Bronx and surrounding area with reliable immigration, criminal and civil law services. We offer a high-success rate and we promise to do our job to the best of our ability." See Ex. EE, Printout of four pages from the God-Man Society Club Inc. website at Uniform Resource Locator (URL) <http://immigrationservices.name>, dated October 13, 2015. On April 11, 2017, the undersigned researched GMSC on the internet and confirmed that the GMSC website was still posted and available. GMSC had updated its website to remove criminal law and civil law areas of practice from the website and added immigration and uncontested divorce to their menu of services provided. However, the content of the website continued to offer criminal law and civil law services. See Exhibit FF, Printout of four pages from the God-Man Society Club Inc. website at Uniform Resource Locator (URL) <http://immigrationservices.name>, dated April 11, 2017.

The NYAG also conducted two undercover operations that corroborated that Respondent has continued to provide legal advice and immigration services to individuals in violation of the Court's 2010 Order and Judgment. On February 23, 2017, the undersigned conducted an Attorney Search on the website of the New York State Unified Court System at

<http://iapps.courts.state.ny.us/attorney/AttorneySearch> and confirmed that Respondent is not registered as a licensed attorney in New York State. See Ex. DD, Printout of the New York State Unified Court System Attorney Director—Attorney Search webpage, dated February 23, 2017. Moreover, the NYAG received information from USCIS that Respondent has filed a Notice of Appearance as Attorney or Representative in at least 527 matters since the Court’s 2010 Judgment and Order. See Part C. 3, infra.

1. Victims have verified that Respondent has violated the Court’s 2010 Order and Judgment.

Despite the Court’s 2010 Order and Judgment, Respondent has continued to represent himself to be an immigration attorney and to provide immigration services. One of his recent victims is Jose Nuñez, who visited Respondent’s business located at 930 Grand Concourse, Suite 1A, Bronx, New York on March 25, 2015. See Ex. I, Affidavit of Jose Nuñez with certified translation (hereinafter “Nuñez Aff.”). Mr. Nuñez explained to Respondent that he wanted to resolve his criminal case. Id. ¶ 2. Respondent identified himself to Mr. Nuñez as an attorney who could provide immigration-related services and assist Mr. Nuñez in his pending criminal case. Id. ¶ 3. Respondent agreed to provide legal representation to Mr. Nuñez in both his criminal and immigration legal matters. Id. ¶ 3-4. Respondent stated to Mr. Nuñez that he would charge Mr. Nuñez the following fees: \$1,500 as an investigation fee, \$5,000 as an initial retainer to start working on his criminal case, and an additional \$8,000 to complete the case. Id. ¶ 3. Respondent also advised Mr. Nuñez, that once he went to court, he would probably be arrested; if that happened, Mr. Nuñez would have to pay Respondent an additional \$3,000 so that Respondent could him out of jail. Id. ¶ 3. Mr. Nuñez paid Respondent a \$650.00 “investigation fee” toward the

investigation fee that the Respondent quoted him. See Ex. I (1), Respondent's receipt for \$650 "investigation fee" paid by Mr. Nunez on March 25, 2015.

Mr. Nuñez visited Respondent a second time and Respondent claimed that Mr. Nuñez would likely be arrested at his home because there was an outstanding bench warrant for Mr. Nuñez. Id. ¶ 4. Respondent then advised Mr. Nuñez that he would have to pay Respondent \$3,000 to arrange for Mr. Nuñez's release from jail if the police arrested him for the pending bench warrant. Id. ¶ 4. Mr. Nuñez felt that Respondent was just pressuring him to give Respondent more money; became very skeptical of Respondent's ability to represent him in the criminal matter; and did not believe the fees that quoted by Respondent were reasonable. Id. ¶ 4. Consequently, Mr. Nuñez stopped communicating with Respondent and did not retain Respondent's legal services.

Another of Respondent's victims is Mr. Noe Muñoz. Mr. Muñoz first met with Respondent on September 30, 2006 to seek assistance in obtaining legal resident status in the United States. See Ex. J, Affidavit of Noe Muñoz (hereinafter "Muñoz Aff."). Respondent agreed to represent Mr. Muñoz in his application for adjustment in his legal immigration status. Id. ¶ 2. Over the next four years, Respondent directed Mr. Muñoz to fill out multiple applications for various legal immigrant status designations. Id. ¶ 2. USCIS denied all of the applications but Respondent kept advising Mr. Muñoz to continue to submit different applications. Id. ¶¶ 3-4.

In February 2010, Respondent provided immigration services to Mr. Muñoz, specifically by assisting Mr. Muñoz in his application to the U.S. Department of Labor for Permanent Employment Certification for a pastor position that Mr. Muñoz held at the Spanish United Pentecostal Church Inc. See Ex. K, ETA Form 9089 and allied documents filed by Respondent. On February 22, 2010, acting on behalf of Mr. Muñoz, Respondent mailed Mr. Muñoz's ETA

Form 9089 Application for Permanent Employment Certification to the U.S. Department of Labor. Id. at 1.

On May 6, 2010, Respondent, as Mr. Muñoz's representative, received a notice from the U.S. Department of Labor, Employment and Training Administration ("DOL") indicating that Mr. Muñoz's Application for Permanent Employment Certification was not certified and was denied because multiple sections of Mr. Muñoz's ETA Form 9089 were incomplete. See Ex. L, U.S. Department of Labor letter dated May 6, 2010 addressed to Respondent as representative/agent; see also Ex. P, Board of Alien Labor Certification Appeals Decision, BALCA Case No. 2011-PER-00095, dated May 19, 2011. DOL's letter further advised Respondent that Mr. Muñoz could seek an appeal of DOL's determination by requesting such appeal within 30 days of the date of the denial notification. See Ex. L at ¶ 2. On June 8, 2010—33 days after the date of the denial notification—Respondent filed a motion with DOL to Re-Open and Re-Consider the Denial of Mr. Muñoz's Application for Permanent Employment Certification. See Ex. M, Respondent's Form ETA 9089 Motion to Re-open and Re-consider Decision on May 6, 2010; see also Ex. P, Board of Alien Labor Certification Appeals Decision, BALCA Case No. 2011-PER-00095, dated May 19, 2011, at 2. The motion was on GMSC letterhead, and Respondent signed the motion for reconsideration as Mr. Muñoz's representative. Id. at 1, 7. DOL received the Respondent's motion for reconsideration on June 14, 2010. Id. at 1. DOL sent Respondent a letter, dated July 27, 2010, advising him that DOL determined that it would not evaluate the merits of Mr. Muñoz's appeal because his request for reconsideration was received more than thirty (30) days after the date of the denial notification. See Ex. N, U.S. Department of Labor letter dated July 27, 2010. The DOL letter indicated that Mr. Muñoz could request of review of DOL's decision not to process

Respondent's motion for reconsideration and that such request should be made to the Board of Alien Labor Certification (BALCA). Respondent filed a second motion dated August 20, 2010, again on GMSC letterhead, on behalf of Mr. Muñoz and his prospective employer Spanish United Pentecostal Church Inc. See Ex. O, Respondent's Form ETA 9089 Motion, dated August 20, 2010, to Re-open and Re-consider Decision on May 6, 2010; see also Ex. P, Board of Alien Labor Certification Appeals Decision, BALCA Case No. 2011-PER-00095, dated May 19, 2011, at 2. Respondent's second motion moved BALCA to Re-Open and Re-Consider the Denial of Mr. Muñoz's Application for Permanent Employment Certification. Id. at 1.

On May 19, 2011, BALCA dismissed Respondent's motion to Re-Open and Re-Consider the Denial of Mr. Munoz's Application for Permanent Employment Certification. See Ex. P, Board of Alien Labor Certification Appeals Decision, BALCA Case No. 2011-PER-00095, dated May 19, 2011. BALCA found that the motion failed to state any grounds for equitable relief from the time limitation for filing a request for reconsideration or BALCA review. Id. at 3-4. BALCA also found that Mr. Muñoz's Permanent Employment Certification was properly denied because DOL found a number of material omissions in Mr. Muñoz's ETA Form 9089. Id. at 4. Mr. Muñoz was harmed by Respondent's unauthorized legal representation of Mr. Muñoz and the Spanish United Pentecostal Church Inc. in this immigration matter in that Mr. Muñoz application was unnecessarily delayed and ultimately denied.

2. The NYAG's undercover operations confirm that Respondent is providing immigration services in violation of this Court's 2010 Order and Judgment.

The NYAG has conducted two undercover operations that further corroborate that Respondent is currently engaged in providing legal advice and immigration services in violation of the Court's 2010 Order and Judgment.

On December 7, 2016, at approximately 11:58 AM, Investigator Elsa Rojas (hereinafter U/C #1) visited the GMSC at 930 Grand Concourse Bronx, New York to seek immigration services from the Respondent. See Ex. Q, New York State Attorney General Investigative Report dated December 19, 2016, Case # 16-021. Posing as a woman named Elba Rosas, U/C #1 entered the building and approached an apartment door to the right of the lobby. Id. at 1. U/C #1 was buzzed into the apartment, entered and observed two females sitting at the front reception desk. Id. U/C #1 told one of females, in Spanish, that she would like to see Respondent. The female directed U/C #1 to a door. Id. U/C #1 approached the door and observed a yellow metal plaque affixed to the door; the plaque read "Vincent I. Gonzalez, immigration provider/The League." Id. U/C #1 knocked on the door and a female voice stated to enter. Id. Once inside the office, U/C #1 met a female, who U/C #1 later learned to be named Shirley ("Shirley"), sitting at a computer desk inside Respondent's office. Id. Speaking only in Spanish, U/C #1 asked to speak with Respondent. Id. Shirley asked U/C #1 if she had an appointment. Id. U/C #1 stated no but that a friend told her to come in and see Respondent about a little dilemma that needed to be taken care of. Id. Shirley asked U/C #1 if she had a case with Mr. Gonzalez. Id. U/C #1 stated not yet. Id. Shirley then picked up the phone. Id. at 2. As Shirley was dialing the phone, U/C #1 asked Shirley if Respondent was a lawyer. Id. Shirley told U/C #1 yes, then Shirley stated that Respondent was a representative for immigration but that all immigration applications processed by their office are signed by lawyers. Shirley spoke to someone called Vincent over the telephone and then ended the call. Id. Shirley then told U/C #1, in Spanish, to return to the office within 30-45 minutes for a consultation with Respondent. Id. Shirley told U/C #1 that the consultation fee would be \$100.00. Id. at 2. U/C #1 agreed to return to the office later that day and left the premises. Id.



At approximately 12:55 PM, U/C #1 returned to Respondent's office at 930 Grand Concourse Bronx, New York. Id. at 3. U/C #1 waited in the waiting area of Respondent's office until Respondent arrived at approximately 2:00 pm. Id. Speaking only in Spanish, Respondent introduced himself as Vincent Gonzalez and stated to U/C #1 that he would be with her shortly. Id. Respondent entered his office and then came out to invite U/C #1 inside. Id. U/C #1 asked Respondent for assistance in obtaining immigration papers for her boyfriend who is originally from Ecuador. Id. U/C #1 further stated that her boyfriend is still married but that his wife no longer lives with him. Id. U/C #1 explained to Respondent that she is married but that her ex-husband lives in Florida. Id.

Respondent advised U/C #1 that her boyfriend needed to get a divorce from his current wife and then the immigration process could be done. Id. Respondent advised U/C #1 that he could do the divorce action for her boyfriend in his office. Id. Respondent further advised U/C #1 that there would be fees for the divorce action as well as for the immigration matter. Id. U/C #1 asked Respondent if he was going to be her lawyer. Id. at 4. Respondent stated to U/C #1 that he is a processor and that within the building there are lawyers but that he does everything. Id. U/C #1 informed the Respondent that she needed to speak with her boyfriend concerning this matter and will get back to the Respondent later. Id. U/C #1 thanked Respondent for his legal advice, then handed him \$100.00 for the consultation fee. Id. Shirley gave U/C #1 a receipt for the fee paid; the receipt was on GMSC letterhead and Respondent signed at his signature block at the bottom of the receipt that listed Respondent's title as "Representative." See Ex. R, Respondent's receipt for "filing fee" paid by Ms. Elba Rosa dated December 17, 2016.

On January 19, 2017, the NYAG conducted a second undercover visit with Respondent, which was memorialized via an audio recording device. On that date, at approximately 11:20 AM, Investigator Andres Rodriguez (hereinafter U/C #2) visited GMSC at 930 Grand Concourse Bronx, New York to seek immigration services from the Respondent. See Ex. S, Transcription and Translation of audio recording memorializing the meeting with U/C #2 and Respondent on January 19, 2017, New York State Attorney General Investigations Case # 16-021. Posing as an immigrant named Angel Perez, U/C #2 entered the building and approached an apartment door to the right of the lobby. Id. at 1. U/C #2 was buzzed into the apartment and entered a room in that apartment. U/C # 2 told a female sitting in the room at a computer desk, in Spanish, that he wished to see Respondent. Id. at 2. He later learned that the female was named Shirley.

Soon thereafter, Respondent entered the office and greeted U/C #2 in Spanish. Id. Speaking only in Spanish, Respondent advised U/C #2 that the consultation fee was \$100, and U/C #2 agreed to pay the fee. Id. at 3. U/C #2 explained that he needed Respondent's help with his immigration status in this country, especially in light of the new President's immigrant deportation policies. Id. Respondent questioned U/C #2 regarding how U/C #2 entered the United States. Id. U/C #2 explained to Respondent that he entered the United States through Mexico, that he has been in the United States for 11 to 12 years, and that U/C #2 was originally from Manta, Ecuador. Id. Respondent asked U/C #2 if he had any family in the United States or elsewhere. Id. U/C # 2 explained that he had a cousin in Florida and that all of his other family members who were in the United States were already deported. Id. Respondent then advised U/C #2 that he could seek a change of his immigration status through marriage, family sponsorship, or permanent employment certification. Id. at 5-7. U/C #2 also asked Respondent if Respondent could represent a friend who

received a summon citation for having an opened alcoholic beverage in public. Id. at 8. Respondent immediately advised U/C #2 that his friend must have received a desk appearance ticket for this summons. Id. Respondent confirmed that he could provide legal representation to U/C # 2's friend and encouraged U/C #2 to tell his friend to visit Respondent's office regarding the summons. Id. Respondent then directed Shirley to give U/C #2 a receipt for the \$100 U/C #2 paid for the consultation. Id. The receipt provided to U/C #2 was on GMSC letterhead and Respondent signed the bottom of the receipt that indicated Respondent's title as "Representative." See Ex. T, Respondent's receipt for "filing fee" paid by Angel Perez dated January 19, 2017.

3. USCIS's records of Respondent's activities further corroborate that Respondent is violating this Court's 2010 Order and Judgment.

On March 16, 2017, Ms. Catherine M. O'Connell, Disciplinary Counsel, USCIS, U.S. Department of Homeland Security, provided the NYAG with copies of three USCIS applications to Register Permanent Residence or Adjust Status wherein the Respondent filed a Notice of Entry of Appearance as Attorney or Representative (hereinafter Form G-28) to represent an immigrant seeking a change in their immigration status. See Ex. U, Declaration of Catherine M. O'Connell, Disciplinary Counsel, U.S. Citizenship and Immigration Services, dated April 12, 2017. Ms. O'Connell also confirmed that Respondent is not an accredited representative of an organization recognized by the Department of Justice and authorized to provide legal advice in immigration matters. Id. Furthermore, Ms. O'Connell confirmed that Respondent is not authorized to act as a representative before USCIS. Id.

According to records provided by USCIS and by way of example, on November 18, 2015, Respondent filed a Form G-28 to represent an individual named Raul Ponce Santos. See Ex. V, DHS Form G-28 Notice of Appearance as Attorney or Accredited Representative; see also Ex. W,

Form I-485 Application to Register Permanent Residence or Adjust Status for Mr. Raul Ponce Santos dated November 18, 2015. Respondent, on behalf of Mr. Santos, submitted an Application to Register Permanent Residence or Adjust Status form (hereinafter Form I-485) that sought an adjustment to Mr. Santos permanent resident status. See Ex. W at 5. On Mr. Santos' Form I-485, Respondent signed no less than ten separation declarations on Mr. Santos' application. Id. at 9, 12, 20, 30, 38, 47, 53, 65, 72, 83. On November 16, 2015, Respondent submitted a motion to USCIS requesting that Mr. Santos' 1-601 Application for Waiver of Ground of Inadmissibility be approved. See Ex. X, Respondent's motion in support of Mr. Raul Santos' 1-601 Application for Waiver of Grounds of Inadmissibility. Unfortunately, Mr. Santos' hopes to become a permanent residence have yet to be realized.

In addition, on May 26, 2015, Respondent filed a Form G-28 to represent an individual named Yolanda Correa Almanzar. See Ex. Y, Respondent's DHS Form G-28 Notice of Appearance as Attorney or Accredited Representative for Yolanda Correa Almanzar. Respondent, on behalf of Ms. Almanzar, submitted a Notice of Appeal or Motion ("Form I-290B"), on which Respondent indicated that he was Ms. Almanzar's "attorney or representative accredited by the Board of Immigration Appeals ("BIA") and that he was associated with the GMSC. See Ex. Z, USCIS Form I-290B submitted by Respondent on behalf of Ms. Yolanda Correa Almanzar. Respondent, acting as Mr. Almanzar's representative, also filed with USCIS a motion to appeal the agency's denial of Ms. Almanzar's Application for Waiver of Grounds of Inadmissibility ("Form I-601"). Id. at 3-5.

USCIS has provided to the NYAG heavily-redacted copies of records in several immigration matters in which Respondent purports to be the attorney or BIA accredited

representative of the named petitioner. For example, the NYAG has reviewed one record submitted by Respondent on behalf of an individual with the initials CMM. See Ex. AA, Respondent's DHS Form G-28 Notice of Appearance as Attorney or Accredited Representative for CMM; see also Ex. BB, USCIS Form I-290B submitted by Respondent on behalf of CMM. CMM was seeking permanent resident status as the abused spouse of a U.S. Citizen or lawful permanent resident. See Ex. BB. On April 6, 2016, USCIS denied CMM's original Petition for Amerasian, Widow(er), or Special immigrant status (hereinafter Form I-360) because the agency concluded that CMM had not established that she entered into the marriage with her spouse in good faith. Id. at 3, 8. Respondent filed a motion dated April 16, 2015, seeking appeal and re-consideration of CMM's petition for an adjustment in her immigration status. Id. at 11. In that motion, Respondent indicated that he was a representative. Id. at 25.

In a declaration dated April 12, 2017, Ms. O'Connell confirmed that between July 2010 and March 2, 2017, Respondent filed a Form G-28 with USCIS in 527 matters on behalf of clients. Ms. O'Connell also confirmed that Respondent is not a licensed attorney nor is he an accredited representative of an organization recognized by the Department of Justice and authorized to provide legal advice in immigration matters. See Ex. U, Declaration of Catherine M. O'Connell, Disciplinary Counsel, U.S. Citizenship and Immigration Services, dated April 12, 2017. In addition, Ms. O'Connell confirmed that Respondent is not authorized to act as a representative before USCIS. Id.

Ms. O'Connell also conducted a search of Form G-28s filed with USCIS from August 6, 2010 through October 24, 2016 and determined that Respondent represented petitioners in numerous immigration matters that included the following types of petitions:

- Form CR-189 - Petition to Remove the Conditions of Residence;
- Form EOIR-29 - Notice of Appeal to the Board of Immigration Appeals from a Decision of a DHS Officer;
- Form I-129F - Petition for Alien Fiancé;
- Form I-130 - Petition for Alien Relative;
- Form I-131 - Application for Travel Document;
- Form I-212 - Application for Permission to Reapply for Admission into the United States After Deportation or Removal;
- Form I-290B - Notice of Appeal or Motion;
- Form I-360 - Petition for Amerasian, Widow(er), or Special Immigrant;
- Form I-485 - Application to Register Permanent Residence or Adjust Status;
- Form I-539 - Application to Extend/Change Nonimmigrant Status;
- Form I-601 - Application for Waiver of Grounds of Inadmissibility;
- Form I-601A - Application for Provisional Unlawful Presence Waiver;
- Form I-730 - Refugee/Asylee Relative Petition;
- Form I-765 - Application for Employment Authorization;
- Form I-821 - Application for Temporary Protected Status;
- Form I-821D - Consideration of Deferred Action for Childhood Arrivals;
- Form I-824 - Application for Action on an Approved Application or Petition;
- Form I-190 - Application to Replace Permanent Resident Card; and
- Form N-565 - Application for Replacement Naturalization/Citizenship Document.

4. Respondent has failed to pay the civil penalties, restitution, compensatory, and costs as ordered in this Court's 2010 Order and Judgment.

Finally, Respondent has violated this Court's 2010 Order and Judgment in that he has failed to make any payment toward the ordered \$127,635 in restitution and compensatory damages to the individuals harmed by his illegal conduct; \$1,845,000 civil penalty; another civil penalty of \$4,275,000; and the costs of the judicial proceeding, including \$2,000 in additional costs pursuant to CPLR § 8303(a)(6)

## **ARGUMENT**

### **POINT I**

#### **PETITIONER IS ENTITLED TO AN ADJUDICATION OF CIVIL CONTEMPT**

To successfully demonstrate civil contempt, the movant must establish by clear and convincing evidence that the non-movant violated an order of the court. See Simens v. Darwish, 104 A.D.3d 465, 466 (1st Dept. 2013). Judiciary Law § 753 states that a "court of record has power to punish, by fine and imprisonment, or either, a neglect or violation of duty, or other misconduct, by which a right or remedy of a party to a civil action or special proceeding, pending in the court may be defeated, impaired, impeded, or prejudiced." Judiciary Law § 753(a); see also Judiciary Law §§ 773 and CPLR § 5104. Civil contempt has four elements. First, there must be a lawful order of the court which clearly expresses an unequivocal mandate that was in effect; second, it must be established with reasonable certainty that the order was disobeyed; third, the party to be held in contempt must have had knowledge of the court's order; and lastly, the movant must demonstrate that a party to litigation was prejudiced in some way. See El-Dehdan v. El-Dehdan, 26 N.Y.3d 19, 29 (2015) (quoting Matter of McCormick v. Axelrod, 59 N.Y.2d 574, 583 (1983)).

Unlike criminal contempt, civil contempt does not require evidence of willful refusal to obey a court order. McCain v. Dinkins, 84 N.Y.2d 216, 226 (1994). Rather, “the mere act of disobedience [of a court order], regardless of its motive, is sufficient to sustain a finding of civil contempt if such disobedience defeats, impairs, impedes or prejudices rights of a party.” Gordon v. Janover, 121 A.D.2d 599, 600 (2d Dept. 1986) (quoting Great Neck Pennysaver v. Central Nassau Publications, Inc., 65 A.D.2d 616, 616–17 (2d Dept. 1978)); accord, McCormick v. Axelrod, 59 N.Y.2d at 583; Yalkowsky v. Yalkowsky, 93 A.D.2d 834, 835 (2d Dept. 1983). Moreover, the essential elements of civil contempt can be established by affidavit. Matter of Garbitelli v. Broyles, 257 A.D.2d 621, 622 (2d Dept. 1999).

In the present case, each of the elements necessary to warrant a ruling of civil contempt has been satisfied. First, this Court issued an order clearly forbidding Respondent from representing himself as an attorney and as someone authorized to offer immigration services for profit. Specifically, the 2010 Order and Judgment “permanently enjoin[ed] Respondent from “engaging in the practice of providing immigration services....” and “engaging in the unauthorized practice of law.” Ex. D, 2008 Decision & Order at 2. Moreover, the Order directed Respondent to pay \$127,635 in restitution and compensatory damages to the individuals harmed by his illegal conduct; \$1,845,000 civil penalty; another civil penalty of \$4,275,000; and the costs of the judicial proceeding, including \$2,000 in additional costs pursuant to CPLR § 8303(a)(6).

Second, as described in the Statement of Facts, *supra*, Respondent has continued to violate the Court’s prior order by: 1) failing to inform his clients that he was prohibited from providing immigration services of any kind; 2) making misleading statements which suggested that he was authorized to lawfully represent clients in their quest to adjust their immigration status in the



United States; 3) continuing to accept payments from clients for providing immigration services and engaging in the unauthorized practice of the law; and 4) failing to make the court-ordered payments for penalties, restitution, compensatory damages, and costs to the NYAG.

Third, Respondent was unequivocally aware of the court's orders. On June 4, 2009, the NYAG sent Respondent a Notice of Intention to Sue at his place of business, which at that time was located at 1806 Amsterdam Avenue, New York, N.Y. 10031. See Ex. A, NYAG Notice of Intention to Sue letter. On September 12, 2009, the NYAG personally served Respondent a Summons requiring him to serve upon the NYAG an answer to the verified complaint filed with the Court. See Ex. C, Affidavit of Service of Summons and Verified Complaint, Index No. 402111/09. On March 2, 2010, the NYAG personally served Respondent an Order to Show Cause advising Respondent that the NYAG would seek a default judgment against him for the relief demanded in the Verified Complaint. See Ex. E, Affidavit of Service of Order to Show Cause Request for Judicial Intervention and supporting documentation, Index No. 402111/09. Finally, on August 6, 2010, the NYAG personally served Respondent the Order and Judgment with Notice of Entry providing Respondent with a true copy of the Order and Judgment of the Honorable Debra A. James dated July 2, 2010, which was duly filed and entered in the office of the Clerk of New York County on July 14, 2010. See Ex. H, Affidavit of Service of Order and Judgment with Notice of Entry Index No. 402111/09; see also Ex. G, Order and Judgment Index No. 402111/09 filed with the New York County Clerk.

Fourth, the People of the State of New York are prejudiced by Respondent's failure to comply with this Court's 2010 Order and Judgment. Respondent's flagrant disobedience of this Court's order and applicable laws impairs and impedes the NYAG in fulfilling its mandate to

protect unsuspecting New Yorkers from being defrauded and victimized. Respondent's repeated disregard for this Court's orders poses an immediate harm to New Yorkers, including Mr. Nuñez and Mr. Muñoz, who seek assistance with the immigration status adjustment process. Respondent is not licensed to practice law in New York State and is not a BIA Authorized Representative authorized to appear before USCIS. Respondent preys on a vulnerable immigrant population who are duped by his false representations, and frequently unaware of the legal recourses available to them. Consequently, Respondent has caused, and unless stopped will continue to cause, irreversible harm to many New Yorkers seeking to acquire legal status in this country. Moreover, the NYAG has been unable to provide monetary restitution to Respondent's past victims because Respondent has failed to make the court-ordered payments.

Thus, the NYAG respectfully submits that it is entitled to an adjudication holding Respondent in civil contempt.

## **POINT II**

### **PETITIONER IS ENTITLED TO AN ADJUDICATION OF CRIMINAL CONTEMPT**

The evidence also supports holding Respondent in criminal contempt of this Court's Order. Judiciary Law § 750(A)(3) states that a person guilty of "willful disobedience to a lawful mandate" may be found in criminal contempt. The essential elements of criminal contempt can be established by affidavit. Garbitelli, 257 A.D.2d at 622. In addition to the "willful disobedience," three elements must be satisfied for a finding of criminal contempt. First, there must be a lawful order of the court which clearly expresses an unequivocal mandate that was in effect; second, it must be established with reasonable certainty that the order was knowingly disobeyed; and lastly, the movant must demonstrate that a party to litigation was prejudiced in some way. McCormick, 59 N.Y.2d at 583.

As described in Point I *supra*, a lawful order of this Court clearly expressed an unequivocal mandate to Respondent, and the People of the State of New York have been prejudiced by Respondent's blatant and continuous violation of that order.

Respondent has knowingly and willfully refused to obey the Court's Order as evidenced by the immigration services he offered and provided to Mr. Jose Nuñez, Mr. Noe Muñoz, Mr. Raul Ponce Santos, Ms. Yolanda Correa Almanzar, Investigator Elsa Rojas, and Investigator Angel Rodriguez. Indeed, Ms. O'Connell's declaration corroborates that Respondent has violated the 2010 Court Order and Judgment at least 527 times since July 2010. For more than six years, Respondent has unabashedly sought and accepted money for immigration services that he is not authorized to perform and flagrantly violated the Court's mandates. Respondent's conduct has demonstrated that he is ready and willing to place his own financial interest above the interest of our society or our legal system.

### **POINT III**

#### **RESPONDENT'S VIOLATION OF THE 2010 ORDER AND JUDGMENT WARRANT INCARCERATION AND A SUBSTANTIAL FINE**

In addition to monetary punishment, Judiciary Law §774 permits a sentence of imprisonment for civil contempt. "[O]ne who has been directed by a court to perform an act that the court finds is within that person's power to perform ... may be imprisoned until the act is performed." People ex rel. Feldman v. Warden of New York City Correctional Institute for Women, 46 A.D.2d 256, 258 (1st Dept. 1974), aff'd, 36 N.Y.2d 846 (1975). Indeed, Judiciary Law § 774 permits punitive sentence of imprisonment of up to six months in civil contempt where it is no longer within the offender's power to comply with the original directive. N.A. Development Co., Ltd. v. Jones, 99 A.D.2d 238, 240–41 (1st Dept. 1984).

In this case, the maximum civil contempt sentence of six months imprisonment for Respondent is appropriate because Respondent has violated this Court's Order well over 500 times since July 2010; he cannot be trusted to comply, and thereby merits substantial punishment. The Judiciary Law also permits the Court to imprison a contemnor for up to thirty days upon a finding of criminal contempt.

Judiciary Law § 751(4) permits the Court to impose a fine of up to \$5,000.00 for every day a person willfully disobeys a lawful mandate of the Supreme Court issued pursuant to Executive Law § 63 (12). Judiciary Law § 751(4) provides that "in fixing the amount of the fine, the court shall consider all of the facts and circumstances directly related to the contempt, including, but not limited to: (i) the extent of the willful defiance of or resistance to the court's mandate, (ii) the amount of gain obtained by the willful disobedience of the mandate, and (iii) the effect upon the public of the willful disobedience." Thus, Judiciary Law §751(4) permits Petitioner to more than nine million dollars in fines for Respondent's blatant, six-year disregard of this Court's 2010 Order and Judgment.

As established in the Statement of Facts, Respondent is continuing to fraudulently holding himself out to the public as an immigration service provider and attorney with no intention of stopping his misconduct. Additionally, Mr. Nuñez, Mr. Muñoz, Mr. Santos and Ms. Correa represent only a small fraction of the individuals Respondent has defrauded since July 2010, as the USCIS has confirmed that Respondent has violated this Court's order at least 527 more times. Given these facts and Respondent's blatantly willful recidivism, the NYAG recommends that the Court impose a substantial fine that will stop Respondent from offering legal services once and for all.

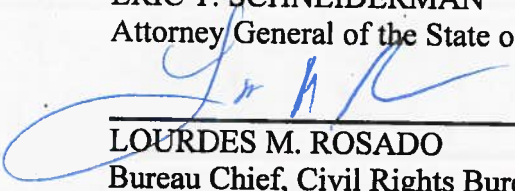
## CONCLUSION

For the reasons set forth in this memorandum of law and accompanying papers, Petitioner respectfully requests that the Court hold Respondent Vincent I. Gonzalez in civil and criminal contempt, sentence Respondent to a substantial period of incarceration, which represents the cumulative maximum length of time permitted under Judiciary Law §§ 751(1) and 774, impose a substantial fine, and award Petitioner such other and further relief as the Court deems just and proper.

Dated: New York, New York  
December 18, 2017

Respectfully submitted,

ERIC T. SCHNEIDERMAN  
Attorney General of the State of New York



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

THE PEOPLE OF THE STATE OF NEW YORK by  
ERIC T. SCHNEIDERMAN, Attorney General of the  
State of New York,

Plaintiff,

- against -

VINCENT I. GONZALEZ and

Defendants.

AFFIRMATION

Index No. 402111/09

Hon. DEBRA A. JAMES

JOSE L. NIEVES, an attorney duly admitted to practice before the courts of the State of New York, hereby affirms the following to be true, under penalty of perjury, pursuant to CPLR § 2106:

1. I am the Deputy Chief of the Special Investigations and Prosecutions Unit in the office of Eric T. Schneiderman, the Attorney General of the State of New York. I represent Petitioner, the People of the State of New York, in this matter and therefore am familiar with the facts set forth in this Affirmation, which are based upon my personal knowledge and information and records obtained by the New York State Office of the Attorney General ("NYAG") during its investigation of Respondent Vincent I. Gonzalez ("Respondent").
2. I submit this Affirmation in support of Petitioner's application for an order pursuant to Judicial § 750(3) adjudging Respondent in civil and criminal contempt.
3. In 2008, the NYAG began investigating a complaint that Respondent was engaged in unlawful business practices, including the unauthorized practice of the law, in representing individuals in immigration related legal filings and proceeding before the United States Citizenship and Immigration Services ("USCIS"). On February 10, 2009, and after the NYAG

had commenced its investigation, Respondent's company Immigration Community Service Corporation entered into a Consent Judgment and Order with the New York City Department of Consumer Affairs ("DCA") for violation of the New York City Immigration Service Provider Law (which mirrors the NYS GBL § 460-a *et seq.*). See Exhibit CC, Consent Judgment/Order between DCA and Immigration Community Service Corporation, Violation No. 0L5178758, dated February 9, 2009. The Consent Judgment and Order with DCA prohibited Immigrant Community Service Corporation from giving legal advice concerning an immigration matter, or otherwise engaging in the practice of law, including selecting or recommending immigration forms for consumers to file, advising consumers as to their likelihood of obtaining an immigration status, and/or advising consumers about how to resolve an immigration matter. Id. p. 3. In the Consent Judgment/Order, Respondent was specifically named as the Immigration Community Service Corporation employee responsible for ensuring compliance with this judgment. Id. p. 14. In addition, Respondent is a signatory of the Consent Judgment/Order and is clearly identified as the Owner/CEO of Immigration Community Service Corporation. Id. p. 16. However, the NYAG received information that Respondent was continuing to defraud immigrant clients and engaging in the unauthorized practice of law even after Respondent entered into the Consent Judgment/Order with DCA. Consequently, by letter dated June 4, 2009, the NYAG notified Respondent of the NYAG's intent to commence litigation against the Respondent and his business Immigration Community Service Corporation. See Ex. A, NYAG Notice of Intention to Sue letter.

4. On August 20, 2009, Petitioner commenced a special proceeding against Respondent pursuant to New York State Executive Law § 63(12) and New York State General Business Law

(“GBL”) Article 22-A. See Ex. B, NYAG Summons and Verified Complaint, Index No. 402111/09.

5. On September 12, 2009, the NYAG personally served Respondent with the Summons and Verified Complaint under Index No. 402111/09. See Ex. C, Affidavit of Service of Summons and Verified Complaint dated September 15, 2009. The Petitioner asserted in its Verified Complaint, and allied papers, that Respondent—through his immigration services business located at 1806 Amsterdam Avenue, New York, New York—repeatedly engaged in discriminatory, deceptive, fraudulent and illegal business practices against New York consumers, including the unauthorized practice of law in New York State. Id. at 1–3.

6. On February 19, 2010, the NYAG filed an Application seeking an Order to Show Cause for Default Judgment. See Ex. D, NYAG Application for Order to Show Cause for a Default Judgment and Memorandum of Law in Support of an Order to Show Cause for Default Judgment dated February 18, 2010. In the Application for Order to Show Cause for a Default Judgment, Petitioner sought a court order enjoining Respondent from engaging in such practices. Id. at 5. On March 2, 2010, Respondent was served with notice of the Order to Show Cause Request for Judicial Intervention and Supporting Documentation. See Ex. E, Affidavit of Service of Order of Show Cause Request for Judicial Intervention and Supporting Documentation.

7. On March 30, 2010, the Honorable Justice Debra James held a hearing to consider the NYAG application by show cause order for default judgment against Respondent. See Ex. F, Transcript of the March 30, 2010, Special Proceeding for NYAG Application for Show Cause Order Part 59–Supreme Court of the State of New York, County of New York, Index No. 402111/09. Justice James granted the NYAG motion for a default judgement against Respondent



and found that the amount sought is calculable based on the papers, thereby negating the need for a hearing on damages pursuant to an inquest. Id. at 7.

8. On July 2, 2010, this Court issued an Order and Judgment (“the 2010 Order and Judgment”) against Respondent that permanently enjoined Respondent from engaging in: (1) the fraudulent and illegal practices alleged in the Verified Complaint; (2) the business of providing immigration services; and (3) the unauthorized practice of law. See Ex. G, Court Order and Judgment dated July 2, 2010 at p. 2-3. Justice James further directed Respondent to pay the following:

- a. \$127,635 in restitution and compensatory damages to the individuals harmed by his illegal conduct;
- b. a civil penalty of \$1,845,000 to the State of New York for 246 violations of GBL Article 28-C pursuant to GBL § 460-h;
- c. another civil penalty of \$4,275,000 to the State of New York for 855 violations of GBL Article 22-A pursuant to GBL §350-d; and
- d. the costs of the judicial proceeding, including \$2,000 in additional costs pursuant to CPLR § 8303(a)(6). Id. at 3-4.

9. From the date of the Court’s issuance of the Order and Judgment, Respondent has engaged in several actions that support the Petitioner’s charges of criminal and civil contempt. As of the filing of this action, Respondent has not made any payments on the \$6,765,871.97 money judgment as required by the 2010 Order and Judgment. Respondent has also filed approximately 527 DHS (“Department of Homeland Security”) Form G-28 Notices of Appearance as Attorney or Accredited Representative with USCIS, including eight appearance notices filed in 2017. In December 2016 and January 2017, Respondent purported to provide

legal counsel and immigration-related services to two undercover NYAG Investigators who posed as potential clients. Finally, as reported by two complainants to the NYAG, Respondent provided immigration-related services to one named client in 2015 and another named client between 2006 to 2011.

10. The NYAG filed the 2010 Order and Judgment with the New York County Clerk's office on July 21, 2010. Id. at 6. On August 6, 2010, Respondent was personally served with the Court's Order and Judgment with Notice of Entry. See Ex. H, Affidavit of Service of Order and Judgment with Notice of Entry Index No. 402111/09.

11. In 2015, the NYAG received a complaint from two individuals alleging that Respondent defrauded them when Respondent provided legal advice and promised to perform other services in connection with one complainant's criminal case and another complainant's immigration matters. According to the complainants' information, Respondent was operating under the company name "God-Man Society Club Inc." ("GMSC"), located at 930 Grand Concourse, Suite 1A, Bronx, NY 10451. On October 12, 2015, the NYAG researched GMSC on the internet and discovered that GMSC openly offered legal services including visa, criminal law, and civil law services. GMSC further boasted on its website that "since being established in 2001, we have provided the Bronx and surrounding area with reliable immigration, criminal and civil law services. We offer a high-success rate and we promise to do our job to the best of our ability." See Exhibit EE, Printout of four pages from the God-Man Society Club Inc. website at Uniform Resource Locator (URL) <http://immigrationservices.name>, dated October 13, 2015. On April 11, 2017 and August 23, 2017, the undersigned researched GMSC on the internet and confirmed that the GMSC website was still posted and available. However, GMSC had updated its website to remove criminal law and civil law areas of practice from the website and added immigration and

uncontested divorce to their menu of services provided. See Ex. FF, Printout of four pages from the God-Man Society Club Inc. website at Uniform Resource Locator (URL)

<http://immigrationservices.name>, dated April 11, 2017; see also Ex. GG, Printout of four pages from the God-Man Society Club Inc. website at Uniform Resource Locator (URL)

<http://immigrationservices.name>, dated August 23, 2017.

12. The NYAG also conducted two undercover operations that corroborated that Respondent has continued to provide legal advice and immigration services to individuals in violation of the Court's 2010 Order and Judgment. On February 23, 2017, the undersigned conducted an Attorney Search on the website of the New York State Unified Court System at <http://iapps.courts.state.ny.us/attorney/AttorneySearch> and confirmed that Respondent is not registered as a licensed attorney in New York State. See Ex. DD, Printout of the New York State Unified Court System Attorney Director – Attorney Search webpage, dated February 23, 2017. Moreover, the NYAG received information from USCIS that Respondent has filed a Notice of Appearance as Attorney or Representative in at least 527 matters since the Court's 2010 Judgment and Order. Despite the Court's 2010 Order and Judgment, Respondent has continued to represent himself as an immigration attorney and to provide immigration services.

13. One of Respondent's recent victims is Jose Nuñez, who visited Respondent's business located at 930 Grand Concourse, Suite 1A, Bronx, New York on March 25, 2015. See Ex. I, Affidavit of Jose Nuñez with certified translation (hereinafter "Nuñez Aff."). Mr. Nuñez explained to Respondent that he wanted to resolve his criminal case. Id. at ¶ 2. Respondent identified himself to Mr. Nuñez as an attorney who could provide immigration-related services and assist Mr. Nuñez in his pending criminal case. Id. at ¶ 3. Respondent agreed to provide legal representation to Mr. Nuñez in both his criminal and immigration legal matters. Id. at ¶¶ 3-4.

Respondent stated to Mr. Nuñez that he would charge Mr. Nuñez the following fees: \$1,500 as an investigation fee, \$5,000 as an initial retainer to start working on his criminal case, and an additional \$8,000 to complete the case. Id. at ¶ 3. Respondent also advised Mr. Nuñez that once he went to court, he would probably be arrested; if that happened, Mr. Nuñez would have to pay Respondent an additional \$3,000 so that Respondent could bail him out of jail. Id. Mr. Nuñez paid Respondent a \$650.00 “investigation fee” toward the investigation fee that Respondent quoted him. See Ex. I (1), Respondent’s receipt for \$650 “investigation fee” paid by Mr. Nunez on March 25, 2015.

14. Mr. Nuñez visited Respondent a second time and Respondent claimed that Mr. Nuñez would likely be arrested at his home because there was an outstanding bench warrant for Mr. Nuñez. See Nuñez Aff. at ¶ 4. Respondent then advised Mr. Nuñez that he would have to pay Respondent \$3,000 to arrange for Mr. Nuñez’s release from jail if the police arrested him for the pending bench warrant. Id. Mr. Nuñez felt that Respondent was just pressuring him to give the Respondent more money; became very skeptical of Respondent’s ability to represent him in the criminal matter; and did not believe the fees that quoted by Respondent were reasonable. Id. Consequently, Mr. Nuñez stopped communicating with Respondent and did not retain Respondent’s legal services.

15. Another of Respondent’s victims is Mr. Noe Muñoz. Mr. Muñoz first met with Respondent on September 30, 2006 to seek assistance in obtaining legal resident status in the United States. See Ex. J, Affidavit of Noe Muñoz (hereinafter “Muñoz Aff.”). Respondent agreed to represent Mr. Muñoz in his application for adjustment in his legal immigration status. Id. at ¶ 2. Over the next four years, Respondent directed Mr. Muñoz to fill out multiple applications for

various legal immigrant status designations. Id. USCIS denied all of the applications but Respondent kept advising Mr. Muñoz to continue to submit different applications. Id. at ¶¶ 3-4.

16. In February 2010, Respondent provided immigration services to Mr. Muñoz, specifically by assisting Mr. Muñoz in his application to the U.S. Department of Labor for Permanent Employment Certification for a pastor position that Mr. Muñoz held at the Spanish United Pentecostal Church Inc. See Ex. K, ETA Form 9089 and allied documents filed by Respondent. On February 22, 2010, acting on behalf of Mr. Muñoz, Respondent mailed Mr. Muñoz's ETA Form 9089 Application for Permanent Employment Certification to the U.S. Department of Labor. Id. at 1.

17. On May 6, 2010, Respondent, as Mr. Muñoz's representative, received a notice from the U.S. Department of Labor, Employment and Training Administration ("DOL") indicating that Mr. Muñoz's Application for Permanent Employment Certification was not certified and was denied because multiple sections of Mr. Muñoz's ETA Form 9089 were incomplete. See Ex. L, U.S. Department of Labor letter dated May 6, 2010 addressed to Respondent as representative/agent; see also Ex. P, Board of Alien Labor Certification Appeals Decision, BALCA Case No. 2011-PER-00095, dated May 19, 2011. DOL's letter further advised Respondent that Mr. Muñoz could seek an appeal of DOL's determination by requesting such appeal within 30 days of the date of the denial notification. See Ex. L, at ¶ 2.

18. On June 8, 2010—33 days after the date of the denial notification—Respondent filed a motion with DOL to Re-Open and Re-Consider the Denial of Mr. Muñoz's Application for Permanent Employment Certification. See Ex. M, Respondent's Form ETA 9089 Motion to Re-open and Re-consider Decision on May 6, 2010; see also Ex. P, Board of Alien Labor Certification Appeals Decision, BALCA Case No. 2011-PER-00095, dated May 19, 2011, at 2.

The motion was on GMSC letterhead, and Respondent signed the motion for reconsideration as Mr. Muñoz's representative. See Ex. M at 1, 7. DOL received the Respondent's motion for reconsideration on June 14, 2010. Id. at 1. DOL sent Respondent a letter, dated July 27, 2010, advising him that DOL determined that it would not evaluate the merits of Mr. Muñoz's appeal because his request for reconsideration was received more than thirty (30) days after the date of the denial notification. See Ex. N, U.S. Department of Labor letter dated July 27, 2010. The DOL letter indicated that Mr. Muñoz could request a review of DOL's decision not to process Respondent's motion for reconsideration and that such request should be made to the Board of Alien Labor Certification (BALCA).

19. Respondent filed a second motion dated August 20, 2010, again on GMSC letterhead, on behalf of Mr. Muñoz and his prospective employer Spanish United Pentecostal Church Inc. See Ex. O, Respondent's Form ETA 9089 Motion to Re-open and Re-consider Decision on May 6, 2010, dated August 20, 2010; see also Ex. P, Board of Alien Labor Certification Appeals Decision, BALCA Case No. 2011-PER-00095, dated May 19, 2011, at 2. Respondent's second motion moved BALCA to Re-Open and Re-Consider the Denial of Mr. Muñoz's Application for Permanent Employment Certification. See Ex. O at 1.

20. On May 19, 2011, BALCA dismissed Respondent's Motion to Re-Open and Re-Consider the Denial of Mr. Munoz's Application for Permanent Employment Certification. See Ex. P, Board of Alien Labor Certification Appeals Decision, BALCA Case No. 2011-PER-00095, dated May 19, 2011. BALCA found that the motion failed to state any grounds for equitable relief from the time limitation for filing a request for reconsideration or BALCA review. Id. at 3-4. BALCA also found that Mr. Muñoz's Permanent Employment Certification was properly denied because DOL found a number of material omissions in Mr. Muñoz's ETA Form 9089. Id. at 4. Mr.

Muñoz and the Spanish United Pentecostal Church Inc. were harmed by Respondent's unauthorized legal representation of Mr. Muñoz in this immigration matter because Mr. Muñoz's application was unnecessarily delayed and ultimately denied.

21. The NYAG has conducted two undercover operations that further corroborate that Respondent is currently engaged in providing legal advice and immigration services in violation of the Court's 2010 Order and Judgment.

22. On December 7, 2016, at approximately 11:58 AM, Investigator Elsa Rojas (hereinafter U/C #1) visited GMSC at 930 Grand Concourse Bronx, New York to seek immigration services from Respondent. See Ex. Q, New York State Attorney General Investigative Report dated December 19, 2016, Case # 16-021. Posing as a woman named Elba Rosas, U/C #1 entered the building and approached an apartment door to the right of the lobby. Id. at 1. U/C #1 was buzzed into the apartment, entered and observed two females sitting at the front reception desk. Id. U/C #1 told one of females, in Spanish, that she would like to see Respondent. The female directed U/C #1 to a door. Id. U/C #1 approached the door and observed a yellow metal plaque affixed to the door; the plaque read "Vincent I. Gonzalez, immigration provider/The League." Id. U/C #1 knocked on the door and a female voice stated to enter. Id. Once inside the office, U/C #1 met a female, who U/C #1 later learned to be named Shirley ("Shirley"), sitting at a computer desk inside Respondent's office. Id. at 1-2. Speaking only in Spanish, U/C #1 asked to speak with Respondent. Id. at 1. Shirley asked U/C #1 if she had an appointment. Id. U/C #1 stated no but that a friend told her to come in and see Respondent about a little dilemma that needed to be taken care of. Id. Shirley asked U/C #1 if she had a case with Mr. Gonzalez. Id. U/C #1 stated not yet. Id. Shirley then picked up the phone. Id. at 2. As Shirley was dialing the phone, U/C #1 asked Shirley if Respondent was a lawyer. Id. Shirley told U/C #1 yes, then Shirley stated that

Respondent was a representative for immigration but that all immigration applications processed by their office are signed by lawyers. Shirley spoke to someone called Vincent over the telephone and then ended the call. Id. Shirley then told U/C #1, in Spanish, to return to the office within 30-45 minutes for a consultation with Respondent. Id. Shirley told U/C #1 that the consultation fee would be \$100.00. Id. U/C #1 agreed to return to the office later that day and left the premises. Id.

23. At approximately 12:55 PM, U/C #1 returned to Respondent's office at 930 Grand Concourse Bronx, New York. Id. at 3. U/C #1 waited in the waiting area of Respondent's office until Respondent arrived at approximately 2:00 pm. Id. Speaking only in Spanish, Respondent introduced himself as Vincent Gonzalez and stated to U/C #1 that he would be with her shortly. Id. Respondent entered his office and then came out to invite U/C #1 inside. Id. U/C #1 asked Respondent for assistance in obtaining immigration papers for her boyfriend who is originally from Ecuador. Id. U/C #1 further stated that her boyfriend is still married but that his wife no longer lives with him. Id. U/C #1 explained to Respondent that she is married but that her ex-husband lives in Florida. Id.

24. Respondent advised U/C #1 that her boyfriend needed to get a divorce from his current wife and then the immigration process could be done. Id. Respondent advised U/C #1 that he could do the divorce action for her boyfriend in his office. Id. Respondent further advised U/C #1 that there would be fees for the divorce action as well as for the immigration matter. Id. U/C #1 asked Respondent if he was going to be her lawyer. Id. at 4. Respondent stated to U/C #1 that he is a processor and that within the building there are lawyers but that he does everything. Id. U/C #1 informed Respondent that she needed to speak with her boyfriend concerning this matter and will get back to Respondent later. Id. at 3. U/C #1 thanked Respondent for his legal advice, then



handed him \$100.00 for the consultation fee. Id. Shirley gave U/C #1 a receipt for the fee paid; the receipt was on GMSC letterhead and Respondent signed at his signature block at the bottom of the receipt that listed Respondent's title as "Representative." See Ex. R, Respondent's receipt for "filing fee" paid by Ms. Elba Rosa, dated December 17, 2016.

25. On January 19, 2017, the NYAG conducted a second undercover visit with Respondent, which was memorialized via an audio recording device. On that date, at approximately 11:20 AM, Investigator Andres Rodriguez (hereinafter U/C #2) visited GMSC at 930 Grand Concourse Bronx, New York to seek immigration services from the Respondent. See Ex. S, Transcription and Translation of audio recording memorializing the meeting with U/C #2 and Respondent on January 19, 2017, New York State Attorney General Investigations Case # 16-021. Posing as an immigrant named Angel Perez, U/C #2 entered the building and approached an apartment door to the right of the lobby. Id. at 1. U/C #2 was buzzed into the apartment and entered a room in that apartment. U/C # 2 told a female sitting in the room at a computer desk, in Spanish, that he wished to see Respondent. Id. at 2. He later learned that the female's name was Shirley.

26. Soon thereafter, Respondent entered the office and greeted U/C #2 in Spanish. Id. Speaking only in Spanish, Respondent advised U/C #2 that the consultation fee was \$100, and U/C #2 agreed to pay the fee. Id. at 3. U/C #2 explained that he needed Respondent's help with his immigration status in this country, especially in light of the new President's immigrant deportation policies. Id. Respondent questioned U/C #2 regarding how U/C #2 entered the United States. Id. U/C #2 explained to Respondent that he entered the United States through Mexico, that he has been in the United States for 11 to 12 years, and that U/C #2 was originally from Manta, Ecuador. Id. Respondent asked U/C #2 if he had any family in the United States or elsewhere. Id. U/C # 2 explained that he had a cousin in Florida and that all of his other family

members who were in the United States were already deported. Id. Respondent then advised U/C #2 that he could seek a change of his immigration status through marriage, family sponsorship, or permanent employment certification. Id. at 5-7. U/C #2 also asked Respondent if Respondent could represent a friend who received a summon citation for having an opened alcoholic beverage in public. Id. at 8. Respondent immediately advised U/C #2 that his friend must have received a desk appearance ticket for this summons. Id. Respondent confirmed that he could provide legal representation to U/C # 2's friend and encouraged U/C #2 to tell his friend to visit Respondent's office regarding the summons. Id. Respondent then directed Shirley to give U/C #2 a receipt for the \$100 U/C #2 paid for the consultation. Id. The receipt provided to U/C #2 was on GMSC letterhead and Respondent signed the bottom of the receipt that indicated Respondent's title as "Representative." See Ex. T, Respondent's receipt for "filing fee" paid by Angel Perez, dated January 19, 2017.

27. USCIS's records of Respondent's activities further corroborate that Respondent is violating this Court's 2010 Order and Judgment. On March 16, 2017, Ms. Catherine M. O'Connell, Disciplinary Counsel, USCIS, U.S. Department of Homeland Security, provided NYAG with copies of three USCIS applications to Register Permanent Residence or Adjust Status wherein the Respondent filed a Notice of Entry of Appearance as Attorney or Representative (hereinafter Form G-28) to represent an immigrant seeking a change in their immigration status. See Ex. U, Declaration of Catherine M. O'Connell, Disciplinary Counsel, U.S. Citizenship and Immigration Services, dated April 12, 2017.

28. Ms. O'Connell also confirmed that Respondent is not an accredited representative of an organization recognized by the Department of Justice and authorized to provide legal advice in

immigration matters. Id. Furthermore, Ms. O'Connell confirmed that Respondent is not authorized to act as a representative before USCIS. Id.

29. USCIS provided the NYAG with records that indicate on November 18, 2015 Respondent filed a Form G-28 to represent an individual named Raul Ponce Santos. See Ex. V, DHS Form G-28 Notice of Appearance as Attorney or Accredited Representative; see also Ex. W, Form I-485 Application to Register Permanent Residence or Adjust Status for Mr. Raul Ponce Santos dated November 18, 2015. Respondent, on behalf of Mr. Santos, submitted an Application to Register Permanent Residence or Adjust Status form (hereinafter Form I-485) that sought an adjustment to Mr. Santos permanent resident status. See Ex. W at 5. On Mr. Santos' Form I-485, Respondent signed no less than ten separate declarations on Mr. Santos' application. Id. at 9, 12, 20, 30, 38, 47, 53, 65, 72, 83. On November 16, 2015, Respondent submitted a motion to USCIS requesting that Mr. Santos' 1-601 Application for Waiver of Ground of Inadmissibility be approved. See Ex. X, Respondent's motion in support of Mr. Raul Santos' 1-601 Application for Waiver of Grounds of Inadmissibility. Unfortunately, Mr. Santos' hopes to become a permanent resident have yet to be realized.

30. USCIS records further revealed that on May 26, 2015, Respondent filed a Form G-28 to represent an individual named Yolanda Correa Almanzar. See Ex. Y, Respondent's DHS Form G-28 Notice of Appearance as Attorney or Accredited Representative for Yolanda Correa Almanzar. Respondent, on behalf of Ms. Almanzar, submitted a Notice of Appeal or Motion ("Form I-290B"), on which Respondent indicated that he was Ms. Almanzar's "attorney or representative accredited by the Board of Immigration Appeals ("BIA") and that he was associated with the GMSC. See Ex. Z, USCIS Form I-290B submitted by Respondent on behalf of Ms. Yolanda Correa Almanzar. Respondent, acting as Mr. Almanzar's representative, also

filed with USCIS a motion to appeal the agency's denial of Ms. Almanzar's Application for Waiver of Grounds of Inadmissibility ("Form I-601"). Id. at 3-5.

31. USCIS has also provided to the NYAG heavily-redacted copies of records in several immigration matters in which Respondent purports to be the attorney or BIA accredited representative of the named petitioner. For example, the NYAG has reviewed one record submitted by Respondent on behalf of an individual with the initials CMM. See Ex. AA, Respondent's DHS Form G-28 Notice of Appearance as Attorney or Accredited Representative for CMM; see also Ex. BB, USCIS Form I-290B submitted by Respondent on behalf of CMM. CMM was seeking permanent resident status as the abused spouse of a U.S. Citizen or lawful permanent resident. See Ex. BB. On April 6, 2016, USCIS denied CMM's original Petition for Amerasian, Widow(er), or Special Immigrant status (hereinafter Form I-360) because the agency concluded that CMM had not established that she entered into the marriage with her spouse in good faith. Id. at 3, 9. Respondent filed a motion dated April 16, 2015, seeking appeal and reconsideration of CMM's petition for an adjustment in her immigration status. Id. at 11. In that motion, Respondent indicated that he was a representative. Id. at 25.

32. In a declaration dated April 12, 2017, Ms. O'Connell confirmed that between July 2010 and March 2, 2017, Respondent filed a Form G-28 with USCIS in 527 matters on behalf of clients. Ms. O'Connell also confirmed that Respondent is not a licensed attorney nor is he an accredited representative of an organization recognized by the Department of Justice and authorized to provide legal advice in immigration matters. See Ex. U, Declaration of Catherine M. O'Connell, Disciplinary Counsel, U.S. Citizenship and Immigration Services, dated April 12, 2017. In addition, Ms. O'Connell confirmed that Respondent is not authorized to act as a representative before USCIS. Id.

33. Ms. O'Connell also conducted a search of Form G-28s filed with USCIS from August 6, 2010 through October 24, 2016 and determined that Respondent represented petitioners in numerous immigration matters that included the following types of petitions:

- a. Form CR-189 - Petition to Remove the Conditions of Residence;
- b. Form EOIR-29 - Notice of Appeal to the Board of Immigration Appeals from a Decision of a DHS Officer;
- c. Form I-129F - Petition for Alien Fiancé;
- d. Form I-130 - Petition for Alien Relative;
- e. Form I-131 - Application for Travel Document;
- f. Form I-212 - Application for Permission to Reapply for Admission into the United States After Deportation or Removal;
- g. Form I-290B - Notice of Appeal or Motion;
- h. Form I-360 - Petition for Amerasian, Widow(er), or Special Immigrant;
- i. Form I-485 - Application to Register Permanent Residence or Adjust Status;
- j. Form I-539 - Application to Extend/Change Nonimmigrant Status;
- k. Form I-601 - Application for Waiver of Grounds of Inadmissibility;
- l. Form I-601A - Application for Provisional Unlawful Presence Waiver;
- m. Form I-730 - Refugee/Asylee Relative Petition;
- n. Form I-765 - Application for Employment Authorization;
- o. Form I-821 - Application for Temporary Protected Status;
- p. Form I-821D - Consideration of Deferred Action for Childhood Arrivals;


- q. Form I-824 - Application for Action on an Approved Application or Petition;
- r. Form I-190 - Application to Replace Permanent Resident Card; and
- s. Form N-565 - Application for Replacement Naturalization/Citizenship Document.

34. Finally, Respondent has violated this Court's 2010 Order and Judgment in that he has failed to make any payment toward the ordered \$127,635 in restitution and compensatory damages to the individuals harmed by his illegal conduct; \$1,845,000 civil penalty; another civil penalty of \$4,275,000; and the costs of the judicial proceeding, including \$2,000 in additional costs pursuant to CPLR § 8303(a)(6). In addition, Respondent has continued to provide immigration services to the immigrant community of this State.

35. In accordance with CPLR Rule 2217(b), I affirm that the Attorney General has not previously requested the relief sought by this motion.

Dated: New York, New York

December 18, 2017

  
Jose L. Nieves  
Deputy Chief  
Special Investigations and Prosecutions Unit

**PLEASE TAKE NOTICE THAT THE PURPOSE OF THIS APPLICATION  
IS TO PUNISH THE ACCUSED VINCENT I. GONZALEZ FOR  
CONTEMPT OF COURT AND SAID PUNISHMENT MAY CONSIST OF A  
FINE, IMPRISONMENT OR BOTH, ACCORDING TO LAW.**

**WARNING:  
YOUR FAILURE TO APPEAR IN COURT MAY RESULT IN YOUR  
IMMEDIATE ARREST AND IMPRISONMENT FOR CONTEMPT OF  
COURT**

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

-----X  
PEOPLE OF THE STATE OF NEW YORK, by  
ERIC T. SCHNEIDERMAN, Attorney General of the State  
of New York,

Petitioner,

-against-

**NOTICE OF MOTION**

Index No. 402111/2009

VINCENT I. GONZALEZ, D/B/A GOD-MAN  
SOCIETY CLUB, INC.

Respondent.

Pursuant to Executive Law § 63(12)  
-----X

**PLEASE TAKE NOTICE** that upon the annexed affirmation of JOSE L. NIEVES,  
Deputy Chief in the New York State Office of the Attorney General, counsel to Petitioner, the  
People of the State of New York, subscribed to on November 30, 2017, with Exhibits annexed  
thereto, and upon the Order and Judgment entered on July 14, 2010, and upon all the papers,  
pleadings and prior proceedings heretofore had herein, Petitioner will move at the [    ] on  
November 30, 2017, or as soon thereafter as counsel can be heard, for an Order:

1) adjudging Respondent Vincent I. Gonzalez ("Respondent") guilty of civil contempt of court pursuant to Judiciary Law §§ 753, 773 and CPLR § 5104, and imposing a sentence of incarceration on Respondent pursuant to Judiciary Law §§ 753, 772 and 774;

2) adjudging Respondent in criminal contempt of court pursuant to Judiciary Law § 750(3), and imposing a substantial fine for each day that he engaged in contemptuous conduct pursuant to Judiciary Law § 751(4), and further punishing Respondent by incarceration pursuant to Judiciary Law §§ 751(1) and 774, for the willful failure of Respondent to obey the Order and Judgment of this Court dated July 2, 2010, and entered with the New York County Clerk's office on July 14, 2010, which disobedience has impaired, impeded, prejudiced, and defeated the rights of the Petitioner; and

3) permanently enjoining Respondent from engaging in the immigration services

ERIC T. SCHNEIDERMAN  
Attorney General of the State of New York



LOURDES M. ROSADO  
Bureau Chief, Civil Rights Bureau  
JOSE L. NIEVES  
Deputy Chief, Special Investigations &  
Prosecutions Unit  
Of Counsel

Civil Rights Bureau  
New York State Office of the Attorney General  
120 Broadway, 4th floor  
(212) 416-6576 (telephone)  
(212) 416-6693 (facsimile)  
jose.nieves@ag.ny.gov (email)



**PLEASE TAKE NOTICE THAT THE PURPOSE OF THIS APPLICATION IS  
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COURT AND SAID PUNISHMENT MAY CONSIST OF A FINE,  
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SUPREME COURT OF THE STATE OF NEW YORK  
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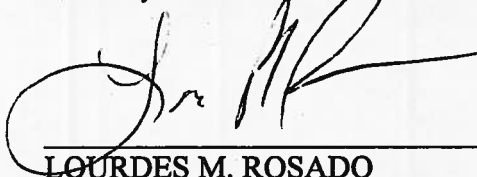
**PLEASE TAKE NOTICE** that upon the annexed affirmation of JOSE L. NIEVES, Deputy Chief in the New York State Office of the Attorney General, counsel to Petitioner, the People of the State of New York, subscribed to on December 18, 2017, with Exhibits annexed thereto, and upon the Order and Judgment entered on July 14, 2010, and upon all the papers, pleadings and prior proceedings heretofore had herein, Petitioner will move this Court at the Motion Submission Part Courtroom, Room 130, located as 60 Centre Street, New York, New York, on the 9<sup>th</sup> Day of January, 2018, at 09:30 in the forenoon, or as soon thereafter as counsel can be heard, for an Order:

1) adjudging Respondent Vincent I. Gonzalez ("Respondent") guilty of civil contempt of court pursuant to Judiciary Law §§ 753, 773 and CPLR § 5104, and imposing a sentence of incarceration on Respondent pursuant to Judiciary Law §§ 753, 772 and 774;

2) adjudging Respondent in criminal contempt of court pursuant to Judiciary Law § 750(3), and imposing a substantial fine for each day that he engaged in contemptuous conduct pursuant to Judiciary Law § 751(4), and further punishing Respondent by incarceration pursuant to Judiciary Law §§ 751(1) and 774, for the willful failure of Respondent to obey the Order and Judgment of this Court dated July 2, 2010, and entered with the New York County Clerk's office on July 14, 2010, which disobedience has impaired, impeded, prejudiced, and defeated the rights of the Petitioner; and

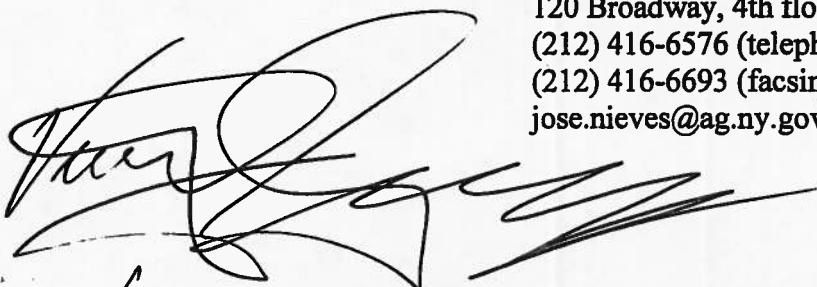
3) permanently enjoining Respondent from engaging in the immigration services

ERIC T. SCHNEIDERMAN  
Attorney General of the State of New York



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Vincent I. Gonzalez<sup>ii</sup> 12/21/17 