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**STATE OF WASHINGTON
PIERCE COUNTY DISTRICT COURT**

THE STATE OF WASHINGTON,
Plaintiff,

NO.
COMPLAINT

v.

EDWIN CRUZ-PEREZ,
AKA EDWIN CRUZ,

Defendant.

DOB: 04/22/1957
PCN#:

SEX: MALE
SID#: WA17740196

RACE: HISPANIC
DOL#: WA – CRUZPE*435J2

CO-DEFENDANT

MAURICE TERRY

I, Robert W. Ferguson, Attorney General of Washington, in the name and by the authority of the State of Washington, pursuant to RCW 43.10.232 and at the request of Mark Lindquist, Pierce County Prosecuting Attorney, do accuse MAURICE TERRY and EDWIN CRUZ of the crimes of: **Criminal Contempt (1 count) and Prohibited Practices – Assistance with Immigration Matters (3 counts)** committed as follows:

Count I - Contempt of Court

I, Robert W. Ferguson, Attorney General, in the name and by the authority of the State of Washington and pursuant to RCW 43.10.232, do accuse MAURICE TERRY and EDWIN CRUZ, of the crime of CONTEMPT OF COURT, committed as follows:

1 On or about July 27, 2016, to June 30, 2018, in the State of Washington, the above-named
2 Defendant did intentionally disobey any lawful judgment, decree, order, or process of the court,
3 to wit: Judgment for Plaintiff State of Washington on Motion to Enforce Consent Decree; and
4 MAURICE TERRY and/or EDWIN CRUZ, was an accomplice in the commission of said
5 crime(s); contrary to Revised Code of Washington 7.21.010(1)(b), RCW 7.21.040 and
6 9A.08.020. (Maximum Penalty- 364 days in jail or \$5,000 fine, or both, pursuant to
7 RCW 7.21.040(5), plus restitution, assessments and court costs.)

8 **Count II - Prohibited Practices – Assistance with Immigration Matters**

9 And I, Robert W. Ferguson, Attorney General, in the name and by the authority of the
10 State of Washington and pursuant to RCW 43.10.232, do accuse MAURICE TERRY and
11 EDWIN CRUZ, of the crime of PROHIBITED PRACTICES – ASSISTANCE WITH
12 IMMIGRATION MATTERS, a crime of the same or similar character, and/or a crime based on
13 the same conduct or on a series of acts connected together or constituting parts of a single scheme
14 or plan, and/or so closely connected in respect to time, place and occasion that it would be
15 difficult to separate proof of one charge from proof of others, committed as follows:

16 On or about the day of July 27, 2016, to December 31, 2016, in the State of Washington,
17 the above-named Defendants engaged in the following acts or practices, for compensation for
18 the Ruelas family: Advised or assisted another person in determining the person's legal or illegal
19 status for the purpose of an immigration matter; Selected or assisted another in selecting, or
20 advised another as to his or her answers on, a government agency form or document in an
21 immigration matter; Selected or assisted another in selecting, or advised another in selecting, a
22 benefit, visa, or program to apply for in an immigration matter; Solicited to prepare documents
23 for, or otherwise represented the interests of, another in a judicial or administrative proceeding
24 in an immigration matter; Explained, advised, or otherwise interpreted the meaning or intent of
25 a question on a government agency form in an immigration matter; Charged a fee for referring
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1 another to a person licensed to practice law; Selected, drafted, or completed legal documents
2 affecting the legal rights of another in an immigration matter; Represented, either orally or in
3 any document, letterhead, advertisement, stationery, business card, web site, or other comparable
4 written material, that he or she is a notario publico, notario, immigration assistant, immigration
5 consultant, immigration specialist, or used any other designation or title, in any language, that
6 conveyed or implied that he or she possessed professional legal skills in the area of immigration
7 law; or Represented, in any language, either orally or in any document, letterhead, advertisement,
8 stationery, business card, web site, or other comparable written material, that he or she can or is
9 willing to provide services in an immigration matter, if such services would constitute the
10 practice of law and the above named Defendants are not licensed to practice law in this state or
11 otherwise permitted to practice law or represent others under federal law in an immigration
12 matter; and MAURICE TERRY and/or EDWIN CRUZ, was an accomplice in the commission
13 of said crime(s); contrary to Revised Code of Washington 19.154.060 and 9A.08.020 and against
14 the peace and dignity of the State of Washington. (Maximum Penalty— 364 days in jail or \$5,000
15 fine, or both pursuant to RCW 19.154.100 and RCW 9A.20.021(2), plus restitution, assessments
16 and court costs.)

17 **Count III - Prohibited Practices – Assistance with Immigration Matters**

18 And I, Robert W. Ferguson, Attorney General, in the name and by the authority of the State of
19 Washington and pursuant to RCW 43.10.232, do accuse EDWIN CRUZ, of the crime of
20 PROHIBITED PRACTICES – ASSISTANCE WITH IMMIGRATION MATTERS, a crime of
21 the same or similar character, and/or a crime based on the same conduct or on a series of acts
22 connected together or constituting parts of a single scheme or plan, and/or so closely connected
23 in respect to time, place and occasion that it would be difficult to separate proof of one charge
24 from proof of others, committed as follows:

25 On or about the day of July 27, 2016, to May 1, 2017, in the State of Washington, the
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1 above-named Defendant engaged in the following acts or practices, for compensation for the
2 Lopez family: Advised or assisted another person in determining the person's legal or illegal
3 status for the purpose of an immigration matter; Selected or assisted another in selecting, or
4 advised another as to his or her answers on, a government agency form or document in an
5 immigration matter; Selected or assisted another in selecting, or advised another in selecting, a
6 benefit, visa, or program to apply for in an immigration matter; Solicited to prepare documents
7 for, or otherwise represented the interests of, another in a judicial or administrative proceeding
8 in an immigration matter; Explained, advised, or otherwise interpreted the meaning or intent of
9 a question on a government agency form in an immigration matter; Charged a fee for referring
10 another to a person licensed to practice law; Selected, drafted, or completed legal documents
11 affecting the legal rights of another in an immigration matter; Represented, either orally or in
12 any document, letterhead, advertisement, stationery, business card, web site, or other comparable
13 written material, that he or she is a notario publico, notario, immigration assistant, immigration
14 consultant, immigration specialist, or used any other designation or title, in any language, that
15 conveyed or implied that he or she possessed professional legal skills in the area of immigration
16 law; or Represented, in any language, either orally or in any document, letterhead, advertisement,
17 stationery, business card, web site, or other comparable written material, that he or she can or is
18 willing to provide services in an immigration matter, if such services would constitute the
19 practice of law and the above named Defendants are not licensed to practice law in this state or
20 otherwise permitted to practice law or represent others under federal law in an immigration
21 matter; contrary to Revised Code of Washington 19.154.060 and 9A.08.020 and against the
22 peace and dignity of the State of Washington. (Maximum Penalty— 364 days in jail or \$5,000 fine,
23 or both pursuant to RCW 19.154.100 and RCW 9A.20.021(2), plus restitution, assessments and
24 court costs.)

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1 stationery, business card, web site, or other comparable written material, that he or she can or is
2 willing to provide services in an immigration matter, if such services would constitute the
3 practice of law and the above named Defendants are not licensed to practice law in this state or
4 otherwise permitted to practice law or represent others under federal law in an immigration
5 matter; contrary to Revised Code of Washington 19.154.060 and 9A.08.020 and against the
6 peace and dignity of the State of Washington. (Maximum Penalty— 364 days in jail or \$5,000 fine,
7 or both pursuant to RCW 19.154.100 and RCW 9A.20.021(2), plus restitution, assessments and
8 court costs.)

9 DATED this 27th day of July, 2018.

10 ROBERT W. FERGUSON
11 Attorney General

12
13 By:


14 TIENNEY MILNOR, WSBA #32701
15 KYLE WOOD, WSBA #31531
16 Assistant Attorneys General
17 Attorneys for Plaintiff
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