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7                   **STATE OF WASHINGTON**  
                  **PIERCE COUNTY DISTRICT COURT**

8   THE STATE OF WASHINGTON,

9                                   Plaintiff,

10                   v.

11   MAURICE TERRY,

12                                   Defendant.

NO.

STATEMENT OF  
PROBABLE CAUSE

13  
14           I, Jesse Burnham, declare under penalty of perjury under the laws of the State of  
15 Washington:

16           I, Jesse Burnham, am an Investigator for the Attorney General's Office. I have  
17 reviewed the investigation conducted by the Attorney General's Office and there is probable  
18 cause to believe that **EDWIN CRUZ**, DOB: 04/22/1957, and **MAURICE TERRY**, DOB:  
19 02/18/1954, as principal or accomplice, DBA/FDBA **E.C. Horizons and E.C. New Horizons**,  
20 committed the crimes of:

- 21           **1. RCW 7.21 Contempt (Gross Misdemeanor) (1 count).**  
22           **2. RCW 19.154.600 Prohibited Practices – Assistance with Immigration Matters**  
                  **(Gross Misdemeanor) (1 counts).**

23           My beliefs are based on the following facts and circumstances, which occurred in  
24 Washington:

25           I, Jesse Burnham, have been employed as an Investigator with the Attorney General's  
26 Office (AGO) since December 16, 2016. My duties include conducting investigations into

1 unfair and deceptive business practices that harm Washington consumers. From August 2013,  
2 to December 2016, I investigated allegations of ethical misconduct against attorneys for the  
3 Washington State Bar Association's Office of Disciplinary Counsel. From August 2007, to  
4 August 2010, I was employed as an investigator for the State of Alaska Public Defender  
5 Agency. From November 2005, to August 2007, I was employed as an investigator for the  
6 Alaska Office of Children's Services.

7 My education includes Bachelor Degrees in Psychology and Sociology from Northern  
8 Arizona University and a Juris Doctor Degree from Gonzaga University School of Law. In  
9 addition to my education, I have received extensive training in conducting investigations by the  
10 AGO, Washington State Bar Association, National Organization of Bar Investigators, and the  
11 State of Alaska Office of Children's Services and Public Defender Agency. These trainings  
12 covered forensic interviewing techniques, computer forensics, and general investigative  
13 practice.

14 As an Investigator with the AGO, one of my primary responsibilities is to investigate  
15 unfair or deceptive acts or practices that victimize Washington consumers, in violation of the  
16 Washington Consumer Protection Act (RCW 19.86). This includes investigating people who  
17 provide immigration services in violation of the Washington Immigration Services Fraud  
18 Prevention Act (RCW 19.154). The facts in this affidavit come from my training and  
19 experience, and from the information and evidence I obtained from witnesses, agents, and  
20 other AGO Investigators.

21 Edwin Cruz-Perez (Cruz) did business as "E.C. New Horizons" (UBI: 602243884), a  
22 sole proprietorship, before Terry joined him. Department of Revenue records show the  
23 registered trade name was first issued on October 25, 2002. After Maurice Terry (Terry)  
24 partnered with Cruz, he obtained a business license of his own, operating as "E C Horizons",  
25 (UBI: 602558955), also a sole proprietorship. DOR records show the registered trade name  
26

1 was first issued on November 21, 2005. The registered physical address for both was 4102  
2 110<sup>th</sup> St. SW Ste. F, (also addressed as "4102 110<sup>th</sup> Pacific Hwy SW, #F") Lakewood (Pierce  
3 County) WA 98499-4195. These accounts remain open as of today's date under the address for  
4 the same physical location. I personally inspected this location recently and found that the  
5 office is unoccupied and that there are signs posted there advising people not to leave mail for  
6 Terry, Cruz, or E C Horizons. Terry and Cruz reside in Pierce County.

7 Beginning in 2010, the Consumer Protection Division of the Attorney General's Office  
8 conducted several investigations and filed multiple enforcement actions against "EC  
9 Horizons", "EC New Horizons", Terry, and Cruz for providing unlawful immigration services  
10 to Washington consumers. During depositions taken during the previous investigations, Terry  
11 and Cruz reported they are former immigration officers with the federal government. Both  
12 were fired from their federal posts. At the time of Cruz's termination, Terry was Cruz's  
13 supervisor. Following the termination of their employment as immigration officers, Cruz and  
14 Terry went into business together as "immigration consultants." A review of the Washington  
15 State Bar Association's lawyer directory and records shows that Terry and Cruz are not, and  
16 never have been, admitted to practice law in the State of Washington. Terry and Cruz also  
17 attested to this fact in previous depositions.

18 As a result of these investigations, on August 23, 2011, the AGO filed a Complaint for  
19 Permanent Injunctive Relief and Other Relief Under the Consumer Protection Act  
20 (RCW 19.86) listing as Defendants Maurice Terry, Edwin Cruz, EC Horizons, and EC New  
21 Horizons, under Pierce County Superior Court Case Number 11-2-12911-5. An AGO  
22 investigation revealed that from January 2008, until approximately March 2011, Terry, Cruz,  
23 EC Horizons, and EC New Horizons entered into 480 separate agreements to provide  
24 immigration-related legal advice and document-preparation services to Washington consumers.  
25 On August 25, 2011, Terry and Cruz entered into a Consent Decree with the AGO. As a result,  
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1 the court imposed \$8,000 in penalties and fees on Terry and Cruz and permanently enjoined  
2 them from violating RCW 19.86 and from providing a wide range of immigration services,  
3 pursuant to RCW 19.154.

4 On May 15, 2014, Terry and Cruz were named as defendants in a private action  
5 wherein the plaintiffs alleged in a complaint that Terry and Cruz violated RCW 19.86 and  
6 RCW 19.154. As required by statute, the AGO received a copy of the complaint and launched  
7 a new investigation into whether Terry and Cruz violated the Consent Decree. On  
8 December 12, 2014, Terry and Cruz settled the private action in exchange for \$34,000.

9 The AGO's new investigation revealed that Terry and Cruz provided illegal  
10 immigration services to additional clients between the time they signed the August 25, 2011  
11 Consent Decree and the end of 2014. After concluding that Terry and Cruz were in violation of  
12 the Consent Decree, the AGO filed a motion to enforce the Consent Decree in Pierce County  
13 Superior Court (Pierce County Superior Court Case Number 11-2-12911-5).

14 On January 8, 2016, Pierce County Judge Vicki Hogan found that Terry and Cruz had  
15 violated the Consent Decree's injunctive terms. Judge Hogan permanently enjoined Terry and  
16 Cruz individually and DBA EC Horizons and EC New Horizons "from further providing any  
17 immigration-related services in any capacity, including providing clerical services related to  
18 immigration matters, whether on their own or as employees of another." Judge Hogan imposed  
19 on Cruz and Terry \$356,449 in civil penalties, restitution, and attorney's fees and costs. The  
20 judgment entitled, "Judgment for Plaintiff State of Washington on Motion to Enforce Consent  
21 Decree", was filed in open court on January 8, 2016, in Pierce County Superior Court Case  
22 Number 11-2-12911-5. The Judgment was signed by Cruz's and Terry's attorney.

23 As of today's date, Terry and Cruz have failed to make any payments toward that  
24 Judgment.

25 In years past, Alexander Chan, an attorney licensed in the State of Washington,  
26



1 provided Cruz and Terry with IRS Form 1099 forms reporting payments he made to them for  
2 work they performed for him on some immigration cases. On June 4, 2018, Chan stated that he  
3 has not worked with Terry or Cruz after 2015.

4 **Complaint 1: Ruelas Family**

5 On December 21, 2016, Aurelio Alonzo Ruelas (Aurelio) filed a complaint with the  
6 AGO Consumer Resource Center. The complaint alleged that Terry and Cruz provided  
7 immigration services to Aurelio and his wife, Ortencia Ruelas (Ortencia). The AGO initiated  
8 an investigation into this complaint in December of 2016. I was assigned as the investigator.

9 Katherine Rich, Aurelio's current immigration attorney, interpreted Spanish/English  
10 during my interview with Aurelio. Aurelio reported he first met with Terry and Cruz at their  
11 EC New Horizon's office in Lakewood, Pierce County, Washington in the summer of 2014.

12 Aurelio is a U.S. citizen. Ortencia is not, but was unlawfully present with Aurelio and  
13 their four children in the United States. Aurelio told Terry and Cruz that he wished to sponsor  
14 his wife under the I-130 "Petition for Alien Relative" process. This process would require  
15 Ortencia to leave the United States to travel back to Mexico, the nation of her citizenship, to be  
16 interviewed by a U.S. Consular official there as part her application to obtain a valid immigrant  
17 visa to the United States.

18 Terry and Cruz advised Aurelio that Ortencia would need to file a Form I-601A  
19 "Application for Provisional Unlawful Presence Waiver" to permit her to return to the United  
20 States after her required consular interview in Mexico. Without the waiver, Ortencia risked  
21 being stopped at the border and deemed "inadmissible" to the United States because of her  
22 extended unlawful presence here before leaving for the interview in Mexico. Terry and Cruz  
23 also advised Aurelio that Ortencia was eligible for this waiver and that they could assist in her  
24 application. They assured Aurelio and Ortencia on multiple occasions that Ortencia qualified.  
25 Terry and Cruz selected the necessary immigration documents, prepared them, and filed them  
26

1 based on the information Aurelio provided.

2 Aurelio estimated he met with Terry and Cruz six times between 2014, and the end of  
3 2016. Specifically, Aurelio said he met with Terry four times and Cruz two times. Eventually,  
4 Aurelio stopped meeting them at the Lakewood, Pierce County office and started meeting them  
5 at public locations in Auburn, Washington.

6 The Ruelas paid cash for their immigration services and gave Terry and/or Cruz money  
7 orders for the immigration filing fees. I reviewed copies of money orders dated May 2, 2015.  
8 Whenever Aurelio received documents from the United States Customs and Immigration  
9 Services (USCIS), he would meet with either Terry or Cruz and provide them the documents.  
10 Either Terry or Cruz would review the documents and assure Aurelio that things were  
11 progressing normally.

12 USCIS received Ortencia's I-601A waiver petition on December 7, 2015. USCIS  
13 granted Ortencia conditional approval of her waiver petition on June 3, 2016, reminding her  
14 that the waiver "only covers the grounds of inadmissibility for unlawful presence in the United  
15 States" and that "[i]f a consular officer determines that you were inadmissible [to the United  
16 States] for any reason other than unlawful presence in the United States, this provisional  
17 unlawful presence waiver is automatically revoked".

18 Aurelio reported that he communicated with Terry on his personal cell phone and that  
19 Terry left voice and text messages. I viewed, recorded, and photographed the messages from  
20 Terry that Aurelio maintained on his cell phone. On August 11, 2016, Terry left a message  
21 identifying himself and asking for an "invoice number." Rich, Aurelio's current immigration  
22 attorney, reported that with an invoice number a person can monitor the status of a Visa  
23 application online. On October 24, 2016, Terry left another message for Aurelio stating that he  
24 checked the file and cannot find a birth certificate. I also observed a text message Terry sent to  
25 Aurelio on July 27, 2016, providing Aurelio with an email address [dosieneal@aol.com](mailto:dosieneal@aol.com).  
26



1 Aurelio reported that he used this email address to communicate with Terry.

2 On September 29, 2016, USCIS notified Ortencia that she was to report for a consular  
3 interview at the U.S. Consulate in Ciudad Juarez, Mexico. In the two weeks preceding the  
4 interview, Ortencia and Aurelio met with Cruz three times, twice at a Starbucks in Auburn,  
5 WA. Cruz assured them things were “fine” and it was a “sure thing.” Aurelio also called Terry  
6 the day before the interview and Terry reassured him that things were fine.

7 Aurelio and Ortencia travelled together to Ciudad Juarez for her November 8, 2016,  
8 interview. Following the interview, Ortencia’s waiver—which Cruz and Terry had said would  
9 guarantee her lawful return back to the United States—was revoked. Ortencia was subject to a  
10 permanent bar from the United States. According to Rich, Ortencia was never eligible for a full  
11 waiver because she was inadmissible to the United States for reasons other than those covered  
12 by the I-601A that Cruz assured her would guarantee her return: Ortencia had two prior illegal  
13 entries into the United States on her record. According to Rich, any competent immigration  
14 attorney would have realized that Ortencia was ineligible on these grounds to return to the  
15 United States and would have advised her against leaving the country.

16 Aurelio called Terry from Mexico. Terry said that he was sorry and he did not know  
17 why Ortencia was barred reentry, insisting still that the waiver “was a sure thing.” Aurelio  
18 contacted Terry again after he returned to the United States to seek Terry’s help to remedy  
19 Ortencia’s situation. On December 5, 2016, Aurelio received a letter from Terry containing  
20 various immigration documents including a handwritten letter from Terry providing  
21 immigration advice and instructing Aurelio to gather additional immigration documentation. I  
22 reviewed a copy of the letter. The letter is written on a small “sticky note”, attached to printed  
23 instructions for filing another form, an I-601 “Application for Waiver of Grounds of  
24 Inadmissibility” and writing an accompanying “extreme hardship letter”. The note is signed  
25 “Maurice.”  
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1        Shortly after receiving this letter mailed in Pierce County, Terry stopped answering  
2 Aurelio's calls and stopped assisting him with Ortencia's immigration matter. Aurelio  
3 consulted with Rich who advised him to file a complaint with the AGO. Terry and Cruz  
4 charged the Ruelas family approximately \$900 for their services.

5        In December of 2016, Aurelio filed a complaint with the AGO. On August 1, 2017,  
6 Aurelio filed a civil suit against Terry and Cruz in Pierce County

7        Records gathered in the course of this investigation revealed that Terry listed  
8 dosieneal@aol.com as the contact email address on several immigration documents that he  
9 filed on behalf of clients. Terry used the same email address to communicate with Aurelio and  
10 to receive and review immigration documents. Terry listed dosieneal@aol.com as the  
11 petitioner's email address on Ortencia's Visa and Alien Registration Application.

12        I reviewed the email records obtained from AOL Inc. for the email address  
13 dosieneal@aol.com in response to the search warrant authorized on July 19, 2017. The email  
14 address is registered in the name of Terry's wife, lists their home address, and was established  
15 in 2000. There are two primary email accounts associated with account. Numerous individuals,  
16 including complainants below and investigators and attorneys from the Consumer Protection  
17 Division of the AGO, confirm that Terry operates this email. A review of the emails shows that  
18 Terry frequently signs his correspondence utilizing his name "Maurice Terry" or part thereof.

19        Contained within the AOL records are numerous emails regarding immigration records  
20 and correspondence for Aurelio Alonzo Ruelas/Ortencia Ruelas. This includes email from/to  
21 Terry with official immigration documents, notice of the complaint to the AGO, and  
22 correspondence between Cruz, Terry, and attorney Alexandar Ying-Chi Chan.

23        ///

24        ///

1                   **Complaint 2: Lopez, Hernandez, and Cardenas**

2                   In an initial telephonic conversation, Lopez reported to this investigator that her aunt  
3 and uncle were receiving immigration consultation services from Cruz and that they referred  
4 Lopez's parents, Hernandez and Cardenas, to him. Lopez reported that Cruz developed a plan  
5 to have Lopez be the sponsor for her parents' I-130 family-based immigration petition. Lopez  
6 initially reported that she believed her parents paid Cruz \$6,700 to handle individual  
7 applications for Hernandez and Cardenas. Cruz collected the bulk of the payment (\$6,000) in  
8 person at the Hernandez/Cardenas residence in Buckley, Pierce County, WA. Cruz also  
9 charged them to have a translation service called "EC Horizons" translate their immigration  
10 documents. He did not inform them that he owned EC Horizons.

11                  Lopez reported that Cruz submitted the immigration paperwork for Hernandez and  
12 Cardenas to USCIS. Lopez reported that Cardenas received paperwork that stated his petition  
13 was accepted; however, Hernandez received paperwork that stated her petition was denied  
14 because the proper fees were not paid and pages were missing from the petition. The family  
15 contacted Cruz for a refund. Cruz was upset, but agreed to provide a refund.

16                  On March 26, 2017, I conducted a follow-up in-person interview with Lopez to clarify  
17 the details regarding Cruz and her parents' immigration matter. Lopez and her parents were  
18 present and Lopez interpreted Spanish/English for her parents during the interview. They told  
19 me that the family first started meeting with Cruz in January or February of 2016. The initial  
20 meetings took place at a McDonald's in Tacoma, Pierce County, WA. When the family  
21 initially hired Cruz, they knew he had worked for the immigration industry in the past and that  
22 he was not an attorney. They hired him understanding that he was someone who could help  
23 them with immigration matters. They worked exclusively with Cruz and were not familiar with  
24 Terry. They reported that on July 13, 2016, Cruz came to the Hernandez/Cardenas residence in  
25 Buckley, Pierce County, WA. Cardenas and Hernandez in total paid Cruz \$8,000 in cash to  
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1 prepare immigration petitions for each of them based on Lopez's sponsorship. Cruz did not  
2 have them sign a contract or fee agreement and he did not issue them a receipt.

3 Hernandez and Lopez reported that they met with Cruz on December 28, 2016, at the  
4 "Jack in the Box near the fairgrounds in Puyallup," Pierce County. The meeting was held at  
5 Hernandez's request because she received notice that her application was denied. Cruz blamed  
6 USCIS for the missing pages in Hernandez's application. Hernandez decided to terminate  
7 Cruz's services and requested a copy of her file and their money back. Hernandez asked why  
8 Cruz had not listed himself as the preparer on the immigration applications and Cruz responded  
9 that he did not have to sign as preparer. He reluctantly agreed to refund them \$5,000 within a  
10 month.

11 On or around January 18, 2017, Lopez, Hernandez, and Cardenas met with Cruz at the  
12 same Jack in the Box in Puyallup. Cruz provided them with Hernandez's immigration  
13 documents and a \$4,000 cashier's check. Cruz requested an additional month to refund the  
14 remainder of the money. Hernandez had an image of the cashier's check on her phone, which I  
15 observed during the interview. The check is issued from Chase Bank in the amount of \$4,000.  
16 Cruz is the remitter and the payor is Hernandez. A notation at the bottom of the cashier's check  
17 states "refund." When Lopez reviewed the immigration documents submitted by Cruz, she  
18 found Cruz did not sign or indicate in any way that he drafted their immigration petition.  
19 Lopez also noticed a letter that Cruz included in Hernandez's application that shows Lopez as  
20 the author, however, Lopez reported she did not write the letter.

21 As February 18, 2017 approached, the family started calling and texting Cruz about the  
22 remainder of the refund. Cruz apparently blocked all of their phone numbers. Cruz also did not  
23 respond to Lopez's emails. Lopez located Cruz's home address from his license plate number.  
24 Lopez, Cardenas, and Hernandez confronted Cruz at his home in Spanaway, Pierce County,  
25 WA. Cruz stated he needed another week to provide the refund and conditioned any further  
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1 refund on Hernandez signing two agreements. Cruz said the first document stated that  
2 Hernandez agreed not to sue Cruz. Hernandez signed this document. The second document  
3 stated that Cruz had the authority to contact USCIS and withdraw all paperwork filed on  
4 Hernandez's behalf. She did not sign this document. Cruz did not provide copies of either  
5 document to Hernandez and both documents were in English. Hernandez relied on Cruz's  
6 explanation of the language contained in those documents.

7 Ultimately, Cruz followed through with the additional refund, sending two money  
8 orders for \$500 each the following week.

9 On April 4, 2017, Lopez faxed this investigator copies of her family's immigration  
10 documents. These documents clarified that, in December of 2016, Hernandez received a  
11 rejection notice for an I-131 application for travel document due to missing pages, and not her  
12 I-130 family petition. These documents also indicated that Hernandez's I-130 family petition  
13 was approved earlier that year on June 10, 2016.

14 **Complaint 3: Aragon**

15 On March 31, 2017, I conducted an interview with Aragon. Rosa Hernandez a paralegal  
16 with the AGO Consumer Protection Division, also attended and interpreted English/Spanish  
17 during the interview.

18 Aragon reported she started consulting with Terry and Cruz in 2011. She hired them  
19 because Terry and Cruz were successful in helping her husband attain U.S. citizenship and she  
20 sought similar relief. When she initially started working with Terry and Cruz, they were doing  
21 business as EC Horizons and had a physical office in Lakewood, Pierce County, WA. Aragon  
22 reported her understanding of her agreement with Cruz was that Cruz was "fixing her  
23 paperwork." Aragon primarily dealt with Cruz. She was familiar with two other men who  
24 worked at the office: a man named "Maury" and a "Chinese attorney."  
25  
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1 On March 16, 2011, Aragon signed a service agreement with EC Horizons. Terry  
2 signed on behalf of EC New Horizons as "Immigration Assistant." Aragon stated that when  
3 she initially hired Terry and Cruz, she did not know whether they were attorneys. Aragon  
4 stated that she would bring her paperwork to the office and provide it to Terry. Terry and Cruz  
5 would select and file her immigration documents. On March 18, 2011, Terry signed a G-28  
6 "Notice of Entry of Appearance as Attorney or Accredited Representative", and included  
7 dosieneal@aol.com as his contact information. Jay Stratton, Aragon's immigration attorney,  
8 provided copies of these immigration documents to the AGO upon commencement of the  
9 investigation regarding Aragon.

10 Later in the course of her immigration case, Aragon started meeting with Cruz at public  
11 places in Tacoma, Pierce County, WA. Aragon told Cruz that he should get another office and  
12 he responded that he was retiring soon and wanted to finish up his cases. Aragon met with  
13 Cruz six times in public locations in Pierce County.

14 In February of 2016, Aragon became concerned about Cruz's handling of her  
15 immigration case because things were taking a very long time and she was concerned that her  
16 "card" was expiring and she would not be able to travel to Mexico. When Aragon asked Cruz  
17 about her concerns, he told her "don't worry." Eventually, she received notice that her  
18 "renewal" was denied because Cruz had not filed the paperwork on time. Stratton later  
19 clarified that Aragon was likely referring to her application for a "green card" or Permanent  
20 Resident Card, which was denied in October of 2016.

21 Aragon contacted Cruz after receiving the denial notice. Cruz blamed the mistake on  
22 "immigration" and again told her not to worry. Cruz said that he would file a new application  
23 "going through her husband." Aragon asked a trusted family member to review her  
24 immigration paperwork. The family member recommended she consult with an immigration  
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1 attorney, Stratton. Aragon reported that Stratton recently started handling Aragon's  
2 immigration case, but that she was planning on meeting with Cruz again in the next few weeks.

3 Aragon allowed me to view and photograph the most recent text messages from Cruz  
4 on her phone. I saw that Aragon exchanged texts with Cruz three separate times in March of  
5 2017. The most recent text was date-stamped ten days prior to my interview with Aragon. In  
6 the text, Cruz requested an additional \$500 from Aragon for immigration services. Aragon  
7 stated that she intended to meet with Cruz and provide him with the additional \$500 payment.

8 On April 6, 2017, I spoke with Stratton. Stratton reviewed Aragon's immigration file  
9 and found the following: in 2010, an I-130 "Petition for Alien Relative" was filed for Aragon  
10 with her husband, a U.S. citizen, as the sponsor. This petition was later withdrawn. Terry also  
11 prepared a successful I-918 "Petition for U Nonimmigrant Status" for Aragon and she  
12 maintained that status for the next four years. Eventually, however, her U-Visa expired.  
13 Stratton reports that an expired U-Visa would eliminate Aragon's eligibility to become a  
14 lawful permanent resident (or obtain a "green card") and Aragon received a denial in  
15 October of 2016. Currently, Aragon has another I-130 petition pending, filed in February of  
16 2017. Stratton stated that he did not file that petition.

#### 17 Email Communications

18 In addition to the three complaints above, email communications show that Terry and  
19 Cruz repeatedly violated the court's January 8, 2016 order. That order, "Judgment for Plaintiff  
20 State of Washington on Motion to Enforce Consent Decree", prohibits Terry and Cruz "from  
21 further providing any immigration-related services in any capacity, including providing clerical  
22 services related to immigration matters, whether on their own or as employees of another." I  
23 reviewed the email obtained from AOL Inc. for the email address [dosieneal@aol.com](mailto:dosieneal@aol.com). This  
24 email address is owned and operated by Terry. These email records show Terry and Cruz  
25  
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1 continued to provide immigration-related services and clerical services related to immigration  
2 matters, in direct violation of the court's order. A few examples are as follows:

3 On May 2, 2017, a person requested Terry to review DACA renewal forms (Deferred  
4 Action for Childhood Arrivals – a form for immigrants who arrived in the United States prior  
5 to their 18<sup>th</sup> birthday). Terry responded, "Hello, can you email the forms that you want to send  
6 so I can review them dosieneal@aol.com."

7 On September 12, 2016, an email originating from Terry's email address to  
8 NVCinquiry@state.gov, the National Visa Center email address for immigration matters,  
9 requested to continue a case because the person that was working with that immigrant had "to  
10 leave the state for personal family reasons and could not continue my case." This email is  
11 signed as the immigrant, but was to and from Terry's email address. This timeframe coincides  
12 with when Terry wrote in other email that he was in Georgia on family matters.

13 On March 6, 2017, an individual asked Terry whether she should apply for citizenship.  
14 Terry responded on March 15, 2017, as follows: "Hello, sorry I just read you email, I think that  
15 in the State of our country, I would suggest that you file for Citizenship. Since trump been in  
16 office you do not know what he will do. If you file now you probably get it done before you  
17 want to travel, it normally takes about three months to get the interview." Signed "Maurice"  
18 "dosieneal@aol.com". On March 19, 2017, Terry again wrote to that same individual from his  
19 email address dosieneal@aol.com and signed as "Maurice" "dosieneal@aol.com", that "... If  
20 you want me to I can work with you to file the N-400 for citizenship . . ." and requests  
21 additional information from the individual. Later that same day, after the individual says "yes I  
22 would like to start", Terry responded by saying "Hello, I found your file, and if your address  
23 and phone number has not changed I can prepare most of the form, but I will need to talk to  
24 you about your income and if you have traveled outside the USA since you became a resident."  
25 This email correspondence continues at least through April 2017.  
26

1        On September 29, 2016, an individual requested Terry to call or meet to discuss  
2 applying for a visitor visa for her mother. October 24, 2016, Terry responded that he was in  
3 Georgia, just checked his email, and tells her that “[t]here is know visa for in laws, and he can  
4 not petition her as a resident Look in USCIS under forms check the I-130 Petition under  
5 instructions and it will explain who you can petition for.” This email correspondence is signed  
6 as “Maurice” [dosieneal@aol.com](mailto:dosieneal@aol.com). Further, in November and December there are several  
7 emails between these two in which Terry provided the individual with a letter to review for the  
8 U.S. Consulate in New Delhi, India, referencing the “Invitation Letter for B/2 Visitor Visa”. In  
9 the email correspondence of November 17, 2016, the individual states that she has attached the  
10 documents and that there are a few things she did not understand in the I-130 petition so she  
11 left it blank. On December 6, 2016, Terry writes “. . . I received the document and everything  
12 is ready to submit.” In January of 2017, Terry provided her with his home address in Bonney  
13 Lake, Pierce County, WA.

14        On April 21, 2017, signed again as “Maurice” “[dosieneal@aol.com](mailto:dosieneal@aol.com)”, Terry wrote, in  
15 pertinent part, “I have been trying to get your request taken care of. However Your President  
16 have ban all forien countries from entering the USA. All I can get is that they have to contact  
17 their Embassy and file for them self. They will have to fill out for DS 160 with the embassy.  
18 Trump executive order will not allow US Citizen to do an invitation letter as we used to do for  
19 a visitor.”

20        On February 22, 2017, Terry contacted Cruz via email stating in pertinent part: “Send  
21 me you address and I will send you some money to pay our bill. I saw a truck yesterday that do  
22 mobile shreeding and I have the number for them. This came on Santiago can you help him.”  
23 Signed “Maurice” “[dosieneal@aol.com](mailto:dosieneal@aol.com).” Attached to the email is an email correspondence  
24 from the National Visa Center addressed to Terry dated February 21, 2017. The NVC letter  
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1 provides information and next steps for a Visa. In response, Cruz provided Terry with his  
2 address Spanaway, Pierce County, WA.

3 Additionally, there are numerous messages to or from the National Visa Center to the  
4 dosieneal@aol.com email account. These emails contain official immigration documents and  
5 communications.

6 In other emails, Terry acknowledged he is not allowed to provide immigration services.  
7 In January of 2017, he stated in an email that "when they shut us down they destroyed the filed  
8 we had." On October 24, 2016, Terry wrote that "sorry I have not contacted you to let you  
9 know that we were force out of business by those jealous Attorneys, however, I received this  
10 notice did you get it already."

11 I declare under penalty of perjury under the laws of the State of Washington that the  
12 foregoing is true and correct to the best of my knowledge.

13 DATED this 27<sup>th</sup> day of July, 2018 at Seattle, Washington.

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16 \_\_\_\_\_  
17 JESSE BURNHAM  
18 Investigator, Attorney General's Office,  
19 Consumer Protection Division  
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