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AUG 20 2

Colorado Supreme Court 101 West Colfax Avenue, Suite 800 Denver, CO 80202	REGULATORY COUNSEL
Original Proceeding in Unauthorized Practice of Law 09UPL97	
<b>Petitioner:</b>  The People of the State of Colorado,  v.  <b>Respondents:</b>  Joseph Corrigan and Simply Done Immigration, LLC.	Supreme Court Case No: 2010SA155
ORDER OF COURT	

Upon consideration of the Petition for Injunction and the Report of Hearing Master Pursuant to C.R.C.P. 236(a) filed in the above cause, and now being sufficiently advised in the premises

IT IS ORDERED that said Respondents, JOSEPH CORRIGAN and SIMPLY DONE IMMIGRATION, LLC shall be, and the same hereby are, ENJOINED from engaging in the unauthorized practice of law in the State of Colorado.

IT IS FURTHER ORDERED that the Respondents, JOSEPH CORRIGAN and SIMPLY DONE IMMIGRATION, LLC are assessed costs in the amount of \$648.85. Said costs to be paid to the Office of Attorney Regulation Counsel, within (30) days of the date of this order.

IT IS FURTHER ORDERED that the Respondents, JOSEPH CORRIGAN and SIMPLY DONE IMMIGRATION, LLC pay restitution in the amounts listed in paragraph 9 of the stipulation.

BY THE COURT, AUGUST 19, 2010.



Case Number: 2010SA155  
Caption: People v Corrigan, Joseph

**CERTIFICATE OF SERVICE**

Copies mailed via the State's Mail Services Division on August 20, 2010.

Honorable William R Lucero  
Office of the Presiding  
Disciplinary Judge  
1560 Broadway, Suite 675  
Denver, CO 80202

Joseph Corrigan  
4553 East Platte Ave  
Colorado Spg, CO 80915

Kim E Ikeler  
OFFICE OF ATTORNEY  
REGULATION  
1560 Broadway Ste 1800  
Denver, CO 80202

Simply Done Immigration, LLC  
4553 E. Platte Ave.  
Colorado Spg, CO 80915

SUPREME COURT, STATE OF COLORADO  ORIGINAL PROCEEDING IN THE UNAUTHORIZED PRACTICE OF LAW BEFORE THE OFFICE OF THE PRESIDING DISCIPLINARY JUDGE 1560 BROADWAY, SUITE 675 DENVER, CO 80202	<b>RECEIVED</b>  AUG 16 2010  ATTORNEY REGULATION
<b>Petitioner:</b> THE PEOPLE OF THE STATE OF COLORADO,	Case Number: <b>10SA155</b>
<b>Respondents:</b> JOSEPH CORRIGAN and SIMPLY DONE IMMIGRATION, LLC.	
<b>REPORT OF HEARING MASTER PURSUANT TO C.R.C.P. 236(a)</b>	

This matter is before the Presiding Disciplinary Judge ("PDJ") on an "Order Appointing Hearing Master" issued by the Colorado Supreme Court ("Supreme Court") on July 7, 2010. In its order, the Supreme Court referred this matter to the PDJ "for findings and recommendations."

### **I. PROCEDURAL HISTORY**

On May 18, 2010, Kim E. Ikeler, Office of Attorney Regulation Counsel ("the People"), filed a "Petition for Injunction" against Joseph Corrigan and Simply Done Immigration, LLC ("Respondents") alleging they had engaged in the unauthorized practice of law. Respondents did not respond to the petition nor did they participate in the proceedings before the Supreme Court.<sup>1</sup>

Nevertheless, upon receipt of the Supreme Court's order, the PDJ concluded that a Status Conference with the parties would be appropriate in order to schedule this matter for an evidentiary hearing. Therefore, on July 26, 2010, the PDJ ordered the People to coordinate the scheduling of a Status Conference to be held on or before Friday, August 13, 2010.

However, on August 5, 2010, the parties filed a "Stipulation, Agreement and Affidavit Consenting to Findings and Recommendations Including Entry of an Order of Injunction and Payment of Restitution and Costs." In the stipulation, Respondents agreed to be enjoined from the practice of law.<sup>2</sup> They also agreed to pay costs in the amount of \$648.85 within thirty (30) days of the

<sup>1</sup> The People filed a "Proof of Service of the Petition for Injunction and Order to Show Cause" with the Supreme Court on June 30, 2010.

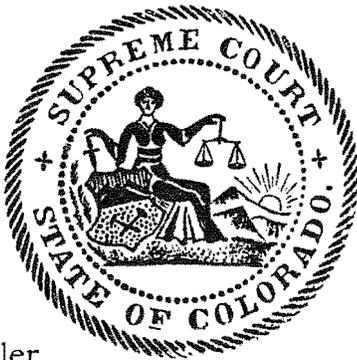
<sup>2</sup> Respondent Simply Done Immigration, LLC no longer operates; it was voluntarily dissolved in April 2009. Respondent Corrigan, as principal for Respondent Simply Done Immigration, LLC, marketed and sold immigration document assistance across the United States.

date of the Supreme Court's order and agreed to repay restitution in the amounts listed in paragraph 9 of the stipulation.

## II. RECOMMENDATION

Accordingly, the PDJ **RECOMMENDS** that the Supreme Court **APPROVE** the stipulation of the parties, enjoin Respondents Joseph Corrigan and Simply Done Immigration, LLC from the unauthorized practice of law, order costs in the amount of \$648.85 to be paid within thirty (30) days of the date of its order, and order restitution in the amounts listed in paragraph 9 of the stipulation.<sup>3</sup> The PDJ further recommends that the Supreme Court **WAIVE** any fine pursuant to C.R.C.P. 236(a).<sup>4</sup>

DATED THIS 16<sup>TH</sup> DAY OF AUGUST, 2010.



  
WILLIAM R. LUCERO  
PRESIDING DISCIPLINARY JUDGE

Copies to:

Kim E. Ikeler  
Office of Attorney Regulation Counsel  
Via Hand Delivery

Joseph Corrigan  
Respondent  
4553 East Platte Avenue  
Colorado Springs, CO 80915  
Via First Class Mail

Simply Done Immigration, LLC  
Respondent  
4553 East Platte Avenue  
Colorado Springs, CO 80915  
Via First Class Mail

Susan Festag  
Colorado Supreme Court  
Via Hand Delivery

<sup>3</sup> The parties further stipulate that any funds ordered to be paid by the Supreme Court will be satisfied from funds held by any state agency that has brought an action against Respondent Corrigan or Respondent Simply Done Immigration, LLC. To the extent available funds do not cover the restitution requirements of the Supreme Court's order, Respondent Corrigan agrees to personally pay any and all additional amounts due to the claimants as restitution. Any order issued by the Supreme Court regarding Respondents' payment of restitution shall not limit other state agencies from seeking and collecting from Respondent damages above and beyond the amount ordered in this matter.

<sup>4</sup> "A report from the Presiding Disciplinary Judge approving the parties' stipulation to injunction, may be exempt from a fine."

SUPREME COURT, STATE OF COLORADO

ORIGINAL PROCEEDING IN UNAUTHORIZED  
PRACTICE OF LAW, 09UPL97  
BEFORE THE PRESIDING DISCIPLINARY JUDGE,  
1560 Broadway, Suite 675  
Denver, CO 80202

Petitioner:  
THE PEOPLE OF THE STATE OF COLORADO

vs.

Respondents:  
JOSEPH CORRIGAN and SIMPLY DONE  
IMMIGRATION, LLC

Kim E. Ikeler, #15590  
Assistant Regulation Counsel  
Attorney for Petitioner  
1560 Broadway, Suite 1800  
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Phone Number: (303) 866-6440  
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E-mail: k.ikeler@csc.state.co.us

Joseph Corrigan, *pro se*  
Simply Done Immigration, LLC  
4553 East Platte Ave.  
Colorado Springs, CO 80915  
719-360-0360

**FILED**

**AUG 05 2010**

PRESIDING DISCIPLINARY JUDGE  
SUPREME COURT OF COLORADO

▲ COURT USE ONLY ▲

Case Number: 10SA154

**STIPULATION, AGREEMENT AND AFFIDAVIT CONSENTING TO FINDINGS  
AND RECOMMENDATIONS INCLUDING ENTRY OF AN ORDER OF  
INJUNCTION AND PAYMENT OF RESTITUTION AND COSTS**

On this 4th day of August 2010, Kim E. Ikeler, Assistant Regulation Counsel, and Joseph Corrigan ("Corrigan") and Simply Done Immigration, LLC ("SDI"), the respondents, enter into the following stipulation, agreement, and affidavit consenting to an order of injunction ("Stipulation") and submit the same to the Presiding Disciplinary Judge for findings and recommendations including entry an order of injunction and payment of restitution and costs, pursuant to C.R.C.P. 229-237.

1. Respondents have a business address of 4553 East Platte Ave., Colorado Springs, CO 80915. SDI no longer operates; it was voluntarily dissolved in April 2009. Corrigan is the former principal of SDI. Corrigan is not licensed to practice law in the State of Colorado. SDI did not employ a licensed Colorado attorney (or any attorney) and none of SDI's employees were supervised by a licensed Colorado attorney (or any attorney). SDI was not an accredited immigration agency and did not employ accredited representatives recognized by the Board of Immigration Appeals. 8 C.F.R. 292.1, 292.2.

2. Respondents enter into this stipulation freely and voluntarily. No promises have been made concerning future consideration, punishment, or lenience in the above-referenced matter. It is respondents' personal decision, and respondents affirm there has been no coercion or other intimidating acts by any person or agency concerning this matter.

3. Respondents are familiar with the rules of the Colorado Supreme Court regarding the unauthorized practice of law. Respondents acknowledge the right to a full and complete evidentiary hearing on the above-referenced petition for injunction. At any such hearing, respondents would have the right to be represented by counsel, present evidence, call witnesses, and cross-examine the witnesses presented by the petitioner. At any such formal hearing, the petitioner would have the burden of proof and would be required to prove the charges contained in the petition for injunction by a preponderance of the evidence. Nonetheless having full knowledge of the right to such a formal hearing, respondents waive that right.

4. Respondents understand that the practice of law in Colorado includes, but is not limited to, the following:

- a. providing advice to any other individual on the legal effect of any proposed action in a legal matter; or assisting that individual in making decisions that require legal judgment and a knowledge of the law that is greater than the average citizen;
- b. providing advice to any other individual as to various legal remedies available to that individual and the possible legal courses of action for that individual;
- c. acting in a representative capacity on behalf of any other individual in matters that affect that individual's legal rights and duties;
- d. selecting or preparing any legal document for any other individual, other than solely as a typist; and, without limiting the above, explaining to that individual or any other individual the legal significance of such document;

- e. holding oneself out as an attorney, lawyer, "esquire", immigration consultant, or legal consultant, either directly or impliedly;
- f. holding oneself out to others in a manner that another individual would place some reliance on the respondent to handle that individual's legal matters;
- g. advertising oneself as an immigration consultant, or being able to select and prepare immigration paperwork on behalf of others (without U.S.B.I.A. accreditation);
- h. making an appearance or speaking on behalf of another individual in negotiations, settlement conferences, mediations, hearings, trials, oral arguments or other legal proceedings unless specifically allowed by the rules that apply to such appearance in such legal proceeding;
- i. serving as a conduit or intermediary on behalf of any other individual for the obtaining or relaying of any legal counsel;
- j. conducting the business of management of a law practice to the extent that the exercise of legal judgment on behalf of another occurs; and
- k. soliciting or accepting any fees for legal services.

5. Respondents and the petitioner stipulate to the following facts and conclusions:

- a. SDI was an immigration forms preparation business. Beginning in mid-2008 and continuing through fall 2009, SDI marketed and sold immigration document assistance to consumers across the United States. On its websites, SDI promised that its specialists would provide phone consultations and immigration document preparation services. The website stated:

Our friendly professional staff are here to help answer any questions and concerns you may have about the whole citizenship process. Simply Done Immigration will take you through each step and help you prepare your documents for submission to the United States Citizenship and Immigration Services.

- b. SDI's website also falsely asserted: "Simply Done Immigration Services has passed rigorous background checks that insure the validity and the overall legitimacy of our business."

- c. The website displayed phone numbers for customers to call SDI. The phone numbers reached SDI's call center in Colorado Springs. SDI employed salespersons to answer the calls. These salespersons often misled callers to believe that SDI was affiliated with the federal government. SDI salespersons persuaded callers to purchase immigration forms from SDI, for prices ranging from several hundred dollars on up to \$1,000 and more. The salespeople then scheduled appointments for the callers with SDI's "document specialists" to assist the callers in completing the forms. The document specialists selected and prepared immigration forms for customers. They also answered the customers' questions and provided advice on immigration law.
- d. SDI required its customers to pay by credit card over the phone or by money order on delivery of completed immigration forms. It was often only after the customers had paid SDI that the customers learned that SDI was not affiliated with the United States Citizenship and Immigration Services ("USCIS") or any other government agency, and that the funds the customers paid to SDI did not include USCIS filing fees. In other instances, SDI selected the wrong forms, or completed the immigration forms inaccurately, with the result that USCIS rejected the forms. On other occasions, SDI did not prepare forms at all after being paid. When angry customers demanded return of their money, SDI employees at times stalled, ignored the customers' requests, and refused to reimburse them.

6. Respondents have read and studied the petition for injunction and is familiar with the allegations therein, and a true and correct copy of the petition for injunction is attached to this stipulation as Exhibit A.

7. Pursuant to C.R.C.P. 251.32, respondents agree to pay the costs and administrative costs in the sum of \$648.85 incurred in conjunction with this matter within thirty (30) days after the acceptance of the stipulation by the Colorado Supreme Court.

8. Based on respondents' cooperation during the investigation and agreement to terms of the within Stipulation, petitioner requests that the Presiding Disciplinary Judge exempt this case from a fine, pursuant to C.R.C.P. 236(a).

9. Another state government agency has taken possession of certain funds formerly held in a merchant account used by SDI. Petitioner has supplied to that agency the names of persons with claims against SDI, along

with copies of affidavits supplied by those persons in support of their claims. The claimants and the amounts claimed by each are as follows:

- Johana Jerome, 2120 Aldrin Road, #3B, Ocean, New Jersey 07712, \$265;
- Stephen McGuire, 7724 McGuire Road, South Fulton, Tennessee 38257, \$860;
- Olayinka Okanlawon, 747 Church Lane, Apt. 206, Landsdowne, Pennsylvania 19050, \$1,015;
- Joshua Omoregbee, 335 Georgetown Drive, Hyde Park, Massachusetts, \$795;
- Theresa Orr, P.O. Box 1143, Middletown, Ohio 45042, \$315;
- Darlene Ragland, 10835 Jessica Ash Drive, Jacksonville, Florida 32218, \$1,000;
- James Stanton, 26 Avenue C, Burlington, Vermont 05408, \$695;
- Colleen Susut, 702 Sunridge Woods, Blvd., Davenport, Florida 33837, \$265;
- Justin Teahuahu, 7565 Dayton Brandt Road, Tipp City, Ohio 45317, \$265; and
- Blessing Tor-Fode, 1317 Clark Street, Des Moines, Iowa 50314, \$365.

10. The parties agree that the claimants should be paid the listed amounts as restitution, pursuant to C.R.C.P. 237(a). The parties ask the Presiding Disciplinary Judge to recommend that the Colorado Supreme Court order that restitution be paid to the above-listed claimants in the amounts listed with their names and addresses.

11. The parties further agree that any funds ordered to be paid by the Colorado Supreme Court will be satisfied from funds held by any state agency that has brought an action against Corrigan or SDI. To the extent available funds do not cover the restitution requirements of the Supreme Court's Order of Injunction, Corrigan agrees to personally pay any and all additional amounts due to the claimants as restitution. The parties ask the Presiding Disciplinary Judge to recommend that the Colorado Supreme Court order Corrigan to personally pay any and all amounts due to the claimants not satisfied from the funds being held by the state agency. Any order issued by the Supreme Court regarding respondent's payment of restitution in this matter shall not limit other state agencies from seeking and collecting from respondent damages above and beyond the amount ordered in this matter.

