

MELISSA L. KAPLAN
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Bureau of Consumer Protection
1600 Arch Street, Third Floor
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215-560-2414
Attorney for Plaintiff



**IN THE COURT OF COMMON PLEAS OF
PHILADELPHIA COUNTY, PENNSYLVANIA**

COMMONWEALTH OF PENNSYLVANIA	:	
BY Attorney General JOSH SHAPIRO	:	
	:	Term _____
	:	
Plaintiff	:	Case No. _____
	:	
v.	:	
	:	
SYED QUMRUZZAMAN a/k/a SYED ZAMAN	:	
520 Elm Avenue,	:	
Upper Darby, PA 19082	:	
	:	
Defendant	:	
	:	

NOTICE TO DEFEND

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action **within twenty (20) days** after this Complaint and notice are served, by entering an appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you, and a judgment may be entered against you without further notice for any money claimed in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICES SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Lawyer Referral and Information Service
Philadelphia County Bar Association
1101 Market Street, 11th Floor
Philadelphia, Pennsylvania 19107
(215) 238-6300
www.philadelphiabar.org
PA Bar Association: www.pabar.org

AVISO

LE HAN DEMANDADO A USTED EN LA CORTE. SI USTED QUIERE DEFENDERSE DE ESTAS DEMANDAS EXPUESTAS EN LAS PAGINAS SIGUIENTES, USTED TIENE VEINTE (20) DIAS DE PLAZO AL PARTIR DE LA FECHA DE LA DEMANDA Y LA NOTIFICACION. HACE FALTA ASCENTAR UNA COMPARENCIA ESCRITA O EN PERSONA O CON UN ABOGADO Y ENTREGAR A LA CORTE EN FORMA ESCRITA SUS DEFENSAS O SUS OBJECIONES A LAS DEMANDAS EN CONTRA DE SU PERSONA. SEA AVISADO QUE SI USTED NO SE DEFIENDE, LA CORTE TOMARA MEDIDAS Y PUEDE CONTINUAR LA DEMANDA EN CONTRA SUYA SIN PREVIO AVISO O NOTIFICACION. ADEMAS, LA CORTE PUEDE DECIDER A FAVOR DEL DEMANDANTE Y REQUIERE QUE USTED CUMPLA CON TODAS LAS PROVISIONES

DE ESTA DEMANDA. USTED PUEDE PERDER DINERO O SUS PROPIEDADES U OTROS DERECHOS IMPORTANTES PARA USTED.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO.

VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

**Asociacion De Licenciados
De Filadelfia
Servicio De Referencia E
Informacion Legal
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**IN THE COURT OF COMMON PLEAS OF
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BY Attorney General JOSH SHAPIRO	:	
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Plaintiff	:	Case No. _____
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v.	:	
	:	
SYED QUMRUZZAMAN a/k/a SYED ZAMAN	:	
520 Elm Avenue,	:	
Upper Darby, PA 19082	:	
	:	
Defendant	:	
	:	

COMPLAINT

AND NOW, comes the Commonwealth of Pennsylvania, acting by Attorney General Josh Shapiro, through the Bureau of Consumer Protection (hereinafter "Commonwealth" or "Plaintiff"), and brings this action pursuant to the Unfair Trade Practices and Consumer Protection Law, 73 P.S. § 201-1, et seq. (hereinafter "Consumer Protection Law") to obtain injunctive relief, civil penalties, restitution and costs against the Defendant. The Consumer Protection Law authorizes the Attorney General to bring an action in the name of the Commonwealth of Pennsylvania to restrain, by temporary or permanent injunction, unfair

methods of competition or unfair or deceptive acts or practices in the conduct of any trade or commerce declared unlawful therein.

The Commonwealth believes that Defendant is willfully using, has willfully used and/or is about to willfully use, methods, acts or practices complained of herein. The Commonwealth believes that its citizens are suffering and will continue to suffer harm unless the acts and practices set forth herein are enjoined.

The Commonwealth believes that the public interest is served by seeking before this Honorable Court an injunction to restrain the methods, acts and practices complained of herein. Further, the Commonwealth requests restitution, civil penalties, costs and other appropriate equitable relief as redress for violations of the Consumer Protection Law, as set forth herein. In support of this action the Commonwealth respectfully represents the following:

JURISDICTION

1. This Court has original jurisdiction over this action pursuant to Section 931 of the Judicial Code. 42 Pa. C.S.A. § 931(a).

VENUE

2. Venue lies with this Court pursuant to Pa. R.C.P. 1006(a)(1).

THE PARTIES

3. Plaintiff is the Commonwealth of Pennsylvania, acting by Attorney General Josh Shapiro, through the Bureau of Consumer Protection, which has offices located at 1600 Arch Street, Third Floor, Philadelphia, Pennsylvania, 19103.

4. Upon information and belief, Defendant, Syed Qumruzzaman a/k/a Syed Zaman (hereinafter referred to as “Defendant Syed”, “Syed” and/or “Defendant”) is a Pennsylvania resident who resides at 520 Elm Avenue, Upper Darby, Pennsylvania, 19082, and who, at the

relevant times discussed herein, conducted business out of his former residence which was located at 201 S. 13th Street, Apt 801, Philadelphia, Pennsylvania 19107.

THE FACTS

5. Defendant Syed was, at all times relevant hereto, engaged in trade and commerce in the Commonwealth of Pennsylvania by soliciting consumers, offering for sale, selling, and providing immigration assistance services, including the acceptance of monies from Pennsylvania consumers for these services.

6. Upon information and belief, Defendant Syed orally held himself out as an attorney with immigration experience, and solicited clients at religious services and through word of mouth.

7. Since at least 2006, Defendant Syed has claimed to Pennsylvania consumers that he could provide immigration assistance services by advising consumers on how they could obtain legal status in the United States, preparing the necessary paperwork, filing the paperwork, and otherwise representing consumers in immigration matters.

8. Defendant Syed often met with Pennsylvania consumers at his Philadelphia apartment to discuss the type of immigration assistance services he could provide.

9. On at least one occasion, Defendant Syed met with three Pennsylvania consumers (herein referred to as “Consumer One”, “Consumer Two” and “Consumer Three”) at the same time regarding their respective citizenship options.

10. On more than one occasion, Defendant Syed met with Consumers One and Two together, informed them of the “costs” of the different forms he could prepare and file on their behalf, and instructed them to provide certain information so that the forms could be prepared.

11. Consumers One and Two signed various immigration forms prepared by Defendant Syed because they believed the Defendant was authorized to prepare and file the forms on their behalf.

12. On at least one occasion, Defendant Syed instructed a consumer to meet him in front of the Robert Nix Federal Courthouse at 900 Market Street in Philadelphia to be fingerprinted. Defendant Syed appeared in a suit outside of the Courthouse and informed the Pennsylvania consumer that the fingerprinting appointment had been canceled and would be rescheduled.

13. Upon information and belief, Defendant Syed collected payments from Pennsylvania consumers for the selection, preparation, and purported filing of immigration forms.

14. Upon information and belief, Defendant Syed instructed Consumers One and Two to deposit money directly into his personal bank account, or to pay with cash in person, for the immigration assistance services he purported to provide.

15. Defendant Syed provided Consumers One, Two and Three with “status updates” on their respective matters, insisting the paperwork was coming and requesting additional payments in the meantime.

16. Upon information and belief, Defendant Syed accepted large sums of money for immigration assistance services which he was not licensed or otherwise authorized provide including but not limited payments from Consumers One, Two and Three as follows:

- a. Consumer One paid Defendant Syed a total of approximately Fifteen Thousand Six Hundred and 00/100 Dollars (\$15,600.00) for immigration assistance services.

b. Consumers Two and Three, a mother and son, together paid Defendant Syed a total of approximately Twelve Thousand Five Hundred Fifteen and 00/100 Dollars (\$12,515.00) for immigration assistance services.

17. Defendant Syed is not, and upon information and belief, has never been, authorized to provide immigration services.

18. Only persons admitted to the Pennsylvania bar are permitted to practice law in this Commonwealth. See 42 Pa.C.S. § 2521.

19. Defendant Syed is not a member of the Pennsylvania bar, and therefore he cannot hold himself out to the public as being entitled to practice law or in a manner which conveys the impression that he is a practitioner of law. See 42 Pa.C.S.A. § 2524.

20. Defendant Syed is not is not otherwise authorized to represent individuals in immigration matters under Federal law. See 8 CFR 292.1.

21. On January 29, 2018, Defendant Syed entered into a negotiated guilty plea in the Delaware County Court of Common Pleas under Docket No. CP-23-CR-6519-2017 for Count One: Theft by Deception- False Impression (18 Pa.C.S.A. § 3922(a)(1)); Count Two: Theft by Deception- False Impression (18 Pa.C.S.A. § 3922(a)(1))¹; and Count Three: The Unauthorized Practice of Law (42 Pa.C.S.A. § 2524).²

22. The Commonwealth believes and therefore avers, that there are consumers who have not filed complaints with the Bureau of Consumer Protection, and who have also been

¹ As part of the aforementioned guilty plea, Defendant Syed was ordered to provide criminal restitution in the amount of Fifteen Thousand Six Hundred and 00/100 Dollars (\$15,600.00) to the individual who is referred to as “Consumer One” in the instant filing. Accordingly, in its prayer for relief Plaintiff requests that restitution sought on behalf of “Consumer One” in the instant action be reduced by amounts paid under the aforementioned criminal action pursuant to 18 Pa.C.S.A. § 1106(g).

² Defendant Syed filed a Motion to Withdraw Guilty Plea on February 8, 2018. On March 1, 2018, a hearing on Defendant Syed’s Motion to Withdraw Guilty plea was held. Defendant Syed withdrew his Motion to Withdraw on March 1, 2018.

harmful due to the methods, acts and practices of the Defendant, which include, but are not limited to, those as alleged herein.

23. The Commonwealth believes the public interest is served by seeking before this Honorable Court an injunction to restrain the operations, methods, acts, and practices of the Defendant as hereinafter set forth, as well as seeking restitution for consumers and civil penalties for violations of the law.

**COUNT I – THE UNAUTHORIZED PRACTICE OF LAW IN VIOLATION OF
THE CONSUMER PROTECTION LAW**

**DEFENDANT SYED ENGAGED IN THE UNAUTHORIZED PRACTICE OF
LAW IN VIOLATION OF 42 Pa.C.S. § 2524 WHICH IS A PER SE VIOLATION
OF THE CONSUMER PROTECTION LAW**

24. The Commonwealth incorporates the preceding paragraphs as though the same were fully set forth herein.

25. Upon information and belief, Defendant Syed held himself out to the public as an attorney who was entitled to practice law in the Commonwealth of Pennsylvania.

26. Upon information and belief, Defendant Syed actually identified himself as an attorney while engaging in conversation at a mosque frequented by Consumers One and Two.

27. On at least one occasion, Defendant Syed met with three Pennsylvania consumers at the same time regarding their respective citizenship options and solicited from said consumers the information he needed to prepare and file the necessary forms on consumers' behalf.

28. Defendant Syed provided these consumers with "status updates" on their "cases", insisting the paperwork was coming and requesting additional payments in the meantime.

29. On at least one occasion, Defendant Syed instructed a consumer to meet him at the Robert Nix Federal Courthouse at 900 Market Street in Philadelphia to be fingerprinted.

Defendant Syed appeared in a suit outside of the Courthouse and informed the Pennsylvania consumer that the fingerprinting appointment had been canceled and would be rescheduled.

30. Only persons admitted to the Pennsylvania bar are permitted to practice law in this Commonwealth. See 42 Pa.C.S. § 2521.

31. Defendant Syed is not a member of the Pennsylvania bar, and therefore he cannot hold himself out to the public as being entitled to practice law or in a manner which conveys the impression that he is a practitioner of law. See 42 Pa.C.S.A. § 2524.

32. Defendant Syed is not otherwise authorized to represent individuals in immigration matters under Federal law. See 8 CFR 292.1.³

33. Pursuant to 42 Pa. C.S.A. § 2524 (a) and (c), the unauthorized practice of law is a *per se* violation of the Consumer Protection Law:

(a) General rule.--Except as provided in subsection (b), any person, including, but not limited to, a paralegal or legal assistant, who within this Commonwealth shall practice law, or who shall hold himself out to the public as being entitled to practice law, or use or advertise the title of lawyer, attorney at law, attorney and counselor at law, counselor, or the equivalent in any language, in such a manner as to convey the impression that he is a practitioner of the law of any jurisdiction, without being an attorney at law or a corporation in compliance with 15 Pa.C.S. Ch. 29...

* * *

³ Title 8 of the Code of Federal Regulations, (hereinafter referred to as “C.F.R.”), allows certain individuals to provide representation for immigration services in matters before the United States Government. Under Section 292.1 of Title 8 of the C.F.R., it is unlawful for a person(s) to provide legal services if he or she is does not meet the requirements provided within 8 C.F.R. §292.1. Title 8 C.F.R. 1.2 defines representation before the Department of Homeland Security (hereinafter referred to as “DHS”) to include practice and preparation. The The C.F.R defines practice as “the act or acts of any person appearing in any case, either in person or through the preparation or filing of any brief or other document, paper, application, or petition on behalf of another person or client before or with DHS”, and preparation as “the study of the facts of a case and the applicable laws, coupled with the giving of advice and auxiliary activities, including the incidental preparation of papers...[.]” A non-exhaustive list of individuals that fall within 8 C.F.R. §292.1 includes attorneys, law students under the supervision of faculty member, attorney, or accredited representative in a legal aid program or clinic of a law school or non-profit organization, and accredited representatives pursuant to 8 C.F.R. §292.2.

(c) ...[M]ay be enjoined in any county court of common pleas having personal jurisdiction over the defendant. The party obtaining such an injunction may be awarded costs and expenses incurred, including reasonable attorney fees, against the enjoined party. A violation of subsection (a) is also a violation of the act of December 17, 1968 (P.L.1224, No.387), known as the Unfair Trade Practices and Consumer Protection Law.

34. By holding himself out as an attorney and engaging in the aforementioned conduct, Defendant Syed “convey[ed] the impression that he was a practitioner of the law. . .” in violation of 42 Pa. C.S.A. § 2524 (a), which is a per se violation of the Consumer Protection Law.

35. The aforementioned methods, acts and practices constitute unfair methods of competition and unfair or deceptive acts or practices in the conduct of trade or commerce prohibited by Section 201-3 of the Consumer Protection Law, as defined by Section 201-2(4) of said Law, including, but not limited to, the following:

- (a) Section 201-2(4)(ii), which prohibits causing likelihood of confusion or of misunderstanding as to the source, sponsorship, approval or certification of goods or services;
- (b) Section 201-2(4)(iii), which prohibits causing the likelihood of confusion or of misunderstanding as to affiliation, connection or association with, or certification by, another;
- (c) Section 201-2(4)(v), which prohibits representing that goods or services have sponsorship, approval, characteristics, benefits, uses or quantities that they do not have or that a person has sponsorship, approval, status, affiliation, or connection that he does not have; and

(d) Section 201-2(4)(xxi), which prohibits engaging in any other fraudulent or deceptive conduct which creates a likelihood of confusion or of misunderstanding.

73 P.S. §§ 201-3, and 201-2(4) (ii),(iii),(v), and (xxi).

36. At all times relevant and material hereto, the unlawful methods, acts and practices complained of have been willfully used by the Defendant.

37. The Commonwealth believes the public interest is served by seeking before this Honorable Court a permanent injunction to restrain the operations, methods, acts, and practices of the Defendant as hereinafter set forth, as well as seeking restitution for consumers and civil penalties for violations of the law.

WHEREFORE, the Commonwealth respectfully requests that this Honorable Court order the following relief:

- A. Declaring the Defendant's conduct as described in the Complaint to be in violation of the Consumer Protection Law;
- B. Directing the Defendant to make full restitution⁴ to all consumers who have suffered losses as a result of the acts and practices alleged in this Complaint and any other acts or practices which violate the Consumer Protection Law;
- C. Permanently enjoining the Defendant, and his officers, agents, employees and all other persons acting on his behalf, directly or indirectly, from violating the Consumer Protection Law and any amendments thereto, and the Unauthorized Practice of Law, including, but not limited to, the following:

⁴ The restitution amount sought on behalf of an individual consumer is to be reduced by amounts paid by Defendant under a criminal judgment involving that same consumer pursuant to 18 Pa.C.S.A. § 1106(g).

1. Causing likelihood of confusion or of misunderstanding as to the source, sponsorship, approval or certification of goods or services in violation of Section 201-2(4)(ii);
2. Providing legal representation or immigration assistance services unless said services are performed under the direct advice and supervision of an attorney or are otherwise authorized pursuant to 8 C.F.R. § 292.1;
3. Causing the likelihood of confusion or of misunderstanding as to affiliation, connection or association with, or certification by, another, in violation of Section 201-2(4)(iii);
4. Representing that goods or services have sponsorship, approval, characteristics, benefits, uses or quantities that they do not have or that a person has sponsorship, approval, status, affiliation, or connection that he does not have, in violation of Section 201-2(4)(v), and
5. Engaging in any other fraudulent or deceptive conduct which creates a likelihood of confusion or of misunderstanding, in violation of Section 201-2(4)(xxi).

- D. Directing the Defendant to pay the Commonwealth a civil penalty in the amount of One Thousand (\$1,000) Dollars for each and every violation of the Consumer Protection Law, and a civil penalty of Three Thousand (\$3,000) Dollars for each and every violation of the Consumer Protection Law where the victim is sixty years of age or older;
- E. Directing the Defendant to disgorge and forfeit all monies he has received as a result of his unfair and deceptive acts and practices as set forth in this Complaint;

- F. Permanently enjoining the Defendant from providing legal representation or immigration assistance services unless said services are performed under the direct advice and supervision of an attorney or are otherwise authorized pursuant to 8 C.F.R. § 292.1;
- G. Requiring the Defendant to pay the Commonwealth's investigative and litigation costs in this matter; and
- H. Granting such further relief as this Court may deem appropriate.

COUNT II – VIOLATIONS OF THE CONSUMER PROTECTION LAW

DEFENDANT SYED ACCEPTED PAYMENTS FROM CONSUMERS FOR SERVICES THAT HE DID NOT AND COULD NOT PROVIDE AS REPRESENTED

38. The Commonwealth incorporates the preceding paragraphs as though the same were fully set forth herein.

39. Upon information and belief, Defendant Syed held himself out to the public as a person who was entitled to practice law in the Commonwealth of Pennsylvania.

40. Upon information and belief, since at least 2006, Defendant Syed has accepted money from Pennsylvania consumers for immigration assistance services.

41. Upon information and belief, Defendant Syed collected payments from Pennsylvania consumers for the selection, preparation, and purported filing of immigration forms.

42. Defendant Syed would meet with Pennsylvania consumers at his Philadelphia apartment to discuss the type of immigration assistance services he could provide.

43. During these meetings, Defendant Syed would tell consumers the different “costs” associated with the forms or papers he would prepare for the consumer.

44. Upon information and belief, though no formal contract for the services existed, consumers would write down the information provided by Defendant Syed during the meetings.

45. On at least one occasion, Defendant Syed met with three Pennsylvania consumers at the same time regarding their respective citizenship options and solicited from said consumers the information he needed to prepare and file the necessary forms on consumers' behalf.

46. Upon information and belief, Defendant Syed never prepared and/or filed one or more of the forms that he collected money from Pennsylvania consumers to prepare and file.

47. Upon information and belief, Defendant Syed instructed these consumers to deposit money directly into his personal bank account, or to pay with cash in person, for the immigration assistance services he purported to provide.

48. Defendant Syed provided these consumers with "status updates" on their "cases", insisting the paperwork was coming and requesting additional payments in the meantime.

49. Upon information and belief, Defendant Syed collected thousands of dollars from Pennsylvania consumers for immigration assistance services that he never provided.

50. Defendant Syed accepted large sums of money for immigration assistance services which he did not provide.

51. The aforementioned methods, acts and practices constitute unfair methods of competition and unfair or deceptive acts or practices in the conduct of trade or commerce prohibited by Section 201-3 of the Consumer Protection Law, as defined by Section 201-2(4) of said Law, including, but not limited to, the following:

1. Section 201-2(4)(ii), which prohibits causing likelihood of confusion or of misunderstanding as to the source, sponsorship, approval or certification of goods or services;

2. Section 201-2(4)(iii), which prohibits causing the likelihood of confusion or of misunderstanding as to affiliation, connection or association with, or certification by, another;
3. Section 201-2(4)(v), which prohibits representing that goods or services have sponsorship, approval, characteristics, benefits, uses or quantities that they do not have or that a person has sponsorship, approval, status, affiliation, or connection that he does not have; and
4. Section 201-2(4)(xxi), which prohibits engaging in any other fraudulent or deceptive conduct which creates a likelihood of confusion or of misunderstanding.

73 P.S. §§ 201-3, and 201-2(4) (ii),(iii),(v), and (xxi).

52. At all times relevant and material hereto, the unlawful methods, acts and practices complained of have been willfully used by the Defendant.

53. The Commonwealth believes the public interest is served by seeking before this Honorable Court a permanent injunction to restrain the operations, methods, acts, and practices of the Defendant as hereinafter set forth, as well as seeking restitution for consumers and civil penalties for violations of the law.

WHEREFORE, the Commonwealth respectfully requests that this Honorable Court order the following relief:

- A. Declaring the Defendant's conduct as described in the Complaint to be in violation of the Consumer Protection Law;

- B. Directing the Defendant to make full restitution⁵ to all consumers who have suffered losses as a result of the acts and practices alleged in this Complaint and any other acts or practices which violate the Consumer Protection Law
- C. Permanently enjoining the Defendant, and his officers, agents, employees and all other persons acting on his behalf, directly or indirectly, from violating the Consumer Protection Law and any amendments thereto, including, but not limited to, the following:
1. Causing likelihood of confusion or of misunderstanding as to the source, sponsorship, approval or certification of goods or services in violation of Section 201-2(4)(ii);
 2. Causing the likelihood of confusion or of misunderstanding as to affiliation, connection or association with, or certification by, another, in violation of Section 201-2(4)(iii);
 3. Representing that goods or services have sponsorship, approval, characteristics, benefits, uses or quantities that they do not have or that a person has sponsorship, approval, status, affiliation, or connection that he does not have, in violation of Section 201-2(4)(v), and
 4. Engaging in any other fraudulent or deceptive conduct which creates a likelihood of confusion or of misunderstanding, in violation of Section 201-2(4)(xxi).
- D. Directing the Defendant to pay the Commonwealth a civil penalty in the amount of One Thousand (\$1,000) Dollars for each and every violation of the Consumer

⁵ The restitution amount sought on behalf of an individual consumer is to be reduced by amounts paid by Defendant under a criminal judgment involving that same consumer pursuant to 18 Pa.C.S.A. § 1106(g).

Protection Law, and a civil penalty of Three Thousand (\$3,000) Dollars for each and every violation of the Consumer Protection Law where the victim is sixty years of age or older;

- E. Directing the Defendant to disgorge and forfeit all monies he has received as a result of his unfair and deceptive acts and practices as set forth in this Complaint;
- F. Permanently enjoining the Defendant from providing legal representation or immigration assistance services unless said services are performed under the direct advice and supervision of an attorney or are otherwise authorized pursuant to 8 C.F .R. § 292.1;
- G. Requiring the Defendant to pay the Commonwealth's investigative and litigation costs in this matter; and
- H. Granting such further relief as this Court may deem appropriate.

Respectfully submitted:

COMMONWEALTH OF PENNSYLVANIA
OFFICE OF ATTORNEY GENERAL

JOSH SHAPIRO
ATTORNEY GENERAL

Date:

1/16/2019

By:



Melissa L. Kaplan
Deputy Attorney General
Attorney I.D. Number 320744
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Attorney for Plaintiff

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COMMONWEALTH OF PENNSYLVANIA
BY Attorney General JOSH SHAPIRO

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Defendant

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VERIFICATION

I, Janis Parrilla, hereby state, hereby state that I am a Consumer Protection Agent Supervisor with the Office of Attorney General, Bureau of Consumer Protection, and am authorized to make this verification on behalf of the Commonwealth in the within action. I hereby verify that the facts set forth in the foregoing Complaint are true and correct to the best of my knowledge, or information and belief. I understand that the statements contained herein are subject to the penalties of 18 Pa. C.S.A. § 4904 relating to unsworn falsification to authorities.

DATE: 1/11/19

By: 