

that unless Defendants are immediately restrained from the acts prohibited below, Defendants will commit such acts before notice can be given and a hearing can be held on the State of Texas= Application for a Temporary Injunction. Further, Defendants could continue to use deception in obtaining money from consumers and may either secrete or remove monies and assets before a judgment for restitution can be rendered. Such injury will be irreparable because continued violations of the DTPA may cause more consumers to lose their money by deception and there will be no monies left for restitution to the consumers if Defendants are allowed time to remove and/or secrete monies or assets. Given the likelihood of dissipation of Defendants= assets prior to rendition of a final judgment, the possibility of restitution for consumers will be remote unless an order freezing assets is granted, therefore the Application for Ex Parte Temporary Restraining Order with Asset Freeze is **GRANTED**.

1. **IT IS THEREFORE ORDERED** that Defendants, **JUST FOR PEOPLE, INC, ELIZABETH GABRIELLA "GABBY" PANEQUE**, also known as **NILDA ODALYS PANEQUE**, also known as **GABRIELLA GATJNES**, individually and doing business as **LEAD GOD, FRANK ALARCON MARIMON**, individually and doing business as **LEAD GOD, AYAN MOHAMED ISMAIL**, doing business as **LEAD GOD**, and **LUZ L. GUERRERO**, individually, their officers, agents, servants, employees, attorneys and any other persons in active concert or participation with them, including but not limited to, **all financial institutions** such as **JP Morgan Chase Bank**¹ holding money in the name and/or for the benefit of the above Defendants, including any accounts for which any named Defendant is a signatory, who receive actual notice of this order by personal service or otherwise, be restrained from engaging in the following acts or practices:

¹ Bank account number known is: Account Number [REDACTED] -JP Morgan Chase

- A. Transferring, concealing, destroying, mutilating, altering, falsifying, or removing from the jurisdiction of this Court any books, records, documents, invoices, receipts, or other written materials relating to the business of Defendant currently or hereafter in Defendant's possession, custody or control except in response to further orders or subpoenas in this cause;
- B. Transferring, spending, hypothecating, concealing, encumbering, withdrawing, removing, or allowing the transfer, removal, or withdrawal, of any money from the jurisdiction of this court or from any financial institution account in the name and/or for the benefit of the above Defendants, including any accounts for which any named Defendant is a signatory;
- C. Transferring, spending, hypothecating, concealing, encumbering, withdrawing, re-moving, or allowing the transfer, removal, or withdrawal of any money, stocks, bonds, assets, notes, equipment, funds, accounts receivable, policies of insurance, trust agreements, or other property, real or personal, or mixed, wherever situated, belonging to or owned by, in the possession of, or claimed by said Defendants;
- D. Selling, conveying, transferring, hypothecating, concealing, encumbering or changing ownership in any form on any real property wherever situated, belonging to or owned by, in the possession of, or claimed by said Defendants;
- E. Selling, conveying, transferring, or changing ownership in any form on any motor vehicle, motorcycle, or truck, including but not limited to the following:

2010 Yamaha XVS650	VIN [REDACTED]	Titled to Frank Alarcon
2009 Dodge Coupe	VIN [REDACTED]	Titled to Frank Alarcon
2009 Yamaha XV1900CU,	VIN [REDACTED]	Titled to Frank Alarcon
1999 Acura 3.2	VIN [REDACTED]	Titled to Frank Alarcon
2008 Toyota FJ	VIN [REDACTED]	Titled to Frank Alarcon
1998 Toyota 4 Runner	VIN [REDACTED]	Titled to Frank Alarcon
2006 Lincoln Mark P-U	VIN [REDACTED]	Titled to Gabriella Paneque
HUMMER H2	VIN [REDACTED]	Titled to Luz L. Guerrero
2005 Ford Five	VIN [REDACTED]	Titled to Frank Alarcon

- F. Destroying, altering, mutilating or otherwise disposing of or changing any records related to any defendant or entity in which any defendant has an ownership interest.

2. **IT IS FURTHER ORDERED** that Defendants, JUST FOR PEOPLE, INC, ELIZABETH GABRIELLA "GABBY" PANEQUE, also known as NILDA ODALYS PANEQUE, also known as GABRIELLA GATJNES, individually and doing business as LEAD GOD, FRANK ALARCON MARIMON, individually and doing business as LEAD GOD, AYAN MOHAMED ISMAIL, doing business as LEAD GOD, and LUZ L. GUERRERO, individually, their officers, agents, servants, employees, attorneys and any other persons in active concert or participation with them, who receive actual notice of this order by personal service or otherwise, be restrained from engaging in the following acts or practices:

- A. Advertising, offering for sale, selling, or providing an immigration service unless Defendants are properly accredited or authorized by the Board of Immigration Appeals;
- B. Accepting money or valuable consideration for performing an immigration service, unless Defendants are properly accredited or authorized by the Board of Immigration Appeals;
- C. Accepting money or valuable consideration from any person seeking assistance to obtain a benefit under U.S. immigration laws for himself or any other person unless Defendants are properly accredited or authorized by the Board of Immigration Appeals;
- D. Advising any person whether or not to file a petition, application, or any other form to obtain a benefit under U.S. immigration laws for himself or any other person unless Defendants are properly accredited or authorized by the Board of Immigration Appeals;
- E. Preparing for any person a petition, application or other form to obtain a benefit under U.S. immigration laws for himself or any other person unless Defendants are properly accredited or authorized by the Board of Immigration Appeals;
- F. Holding itself/himself/herself out, by any means, to the public as an "immigration specialist," "immigration counselor," or "immigration consultant" and by any title or designation incorporating the word "immigration" or an abbreviation thereof unless Defendants are properly accredited or authorized by the Board of

Immigration Appeals;

- G. Representing, directly or by implication, that Defendants have the skill, expertise, or competence to handle immigration matters unless Defendants are properly accredited or authorized by the Board of Immigration Appeals;
- H. Showing, directly or by implication, any affiliation, connection, or association with a government immigration agency;
- I. Representing, directly or by implication, that this Court, the Board of Immigration Appeals, Homeland Security or the Office of the Attorney General has approved any good or service sold or offered for sale by Defendants, or approved any of Defendants' business practices.
- J. Threatening any potential witness and/or former client or their family members with deportation or calls to immigration authorities.

3. **IT IS FURTHER ORDERED** that Defendants JUST FOR PEOPLE, INC, ELIZABETH GABRIELLA "GABBY" PANEQUE, also known as NILDA ODALYS PANEQUE, also known as GABRIELLA GATJNES, individually and doing business as LEAD GOD, FRANK ALARCON MARIMON, individually and doing business as LEAD GOD, AYAN MOHAMED ISMAIL, doing business as LEAD GOD, and LUZ L. GUERRERO, individually, provide Counsel for the State, no later than three business days after the service of this ORDER, an inventory of:

- A. A list of all motor vehicles in which they have an interest, including the make, model, year and vehicle identification number of each vehicle.
- B. A list of all real property, in or out of the country, in which they have an interest.
- C. A list of all other assets, tangible or intangible.

4. **IT IS FURTHER ORDERED** that Defendants, JUST FOR PEOPLE, INC, ELIZABETH GABRIELLA "GABBY" PANEQUE also known as NILDA ODALYS PANEQUE, also known as GABRIELLA GATJNES, individually and doing business as LEAD GOD, FRANK ALARCON MARIMON, individually and doing business as LEAD GOD, AYAN MOHAMED ISMAIL, doing business as LEAD GOD, and LUZ L. GUERRERO, individually, **direct any**

financial or brokerage institution, escrow agent, title company, storage facility, commodity trading company, business entity or person maintaining or having custody or control of any account or other assets of Defendants to provide Counsel for the State a statement or letter setting forth:

- A. The identification of each account or asset titled in the name, individually or jointly, of Defendants, or held on behalf of, or for the benefit of, Defendants;
- B. The balance of each such account or a description and estimated value of such assets, ~~as of the close of business on the day on which this Order is served, and, if~~ the account or other assets was remitted; and
- C. The identification of any safe deposit box or storage facility that is either titled in the name individually or jointly, of Defendants, or is otherwise subject to access or control by Defendants.

IT IS ORDERED that this statement or letter **SHALL BE DUE** to Counsel for the State within three business days of the service of this ORDER.

5. **IT IS FURTHER ORDERED** that the State is **GRANTED** leave to conduct discovery, prior to any scheduled temporary injunction hearing upon reasonable shortened notice to Defendants and their attorneys, if known, including but not limited to:

- A. Taking telephonic, video, written, and other depositions along with subpoena duces tecum; and
- B. Issuing Requests for Production, Requests for Admissions and Interrogatories with a reasonably shortened response date.

6. **IT IS FURTHER ORDERED** that Defendants, JUST FOR PEOPLE, INC, ELIZABETH GABRIELLA "GABBY" PANEQUE, also known as NILDA ODALYS PANEQUE, also known as GABRIELLA GATJNES, individually and doing business as LEAD GOD, FRANK ALARCON MARIMON, individually and doing business as LEAD GOD, AYAN MOHAMED ISMAIL, doing business as LEAD GOD, and LUZ L. GUERRERO, individually, be and hereby are commanded forthwith to comply with this Order from the date of entry until and to the

fourteenth (14th) day after entry or until further order of this Court, whichever is less.

7. The Clerk of the above-entitled Court shall forthwith issue an **Ex Parte Temporary Restraining Order** in conformity with the law and the terms of this Order. This Order shall be effective without the execution and filing of a bond as Plaintiff, State of Texas, is exempt from filing a bond for a temporary restraining order or temporary injunction under section 6.001 of the ~~Texas Civil Practice and Remedies Code and section 17.47(b) of the Texas Business and Commerce Code.~~

8. The Hearing on Plaintiff State of Texas= Application for a Temporary Injunction is hereby set for the 3rd day of August, 2012 at 9:0 o'clock, a.m.

SIGNED this 24th day of July 2012 at 11:54 o'clock, A m.



JUDGE PRESIDING