

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF COLORADO

In re:)
Marquita J. Mathis) Case No. 21-14283 MER
SSN: xxx-xx-8056) Chapter 7
Debtor.)

**ORDER APPROVING STIPULATED RESOLUTION OF UNITED STATES TRUSTEE’S
MOTION FOR FORFEITURE OF FEES, AWARD OF STATUTORY DAMAGES,
IMPOSITION OF FINES AND PENALTIES, ENFORCEMENT OF INJUNCTIVE
ORDER, AND FOR FINDING OF CONTEMPT AGAINST ANGEL AMOR TRUJILLO**

This matter having come before the Court on the *Stipulated Motion for Entry of Order Resolving United States Trustee’s Motion for Forfeiture of Fees, Award of Statutory Damages, Imposition of Fines and Penalties, and Enforcement of Injunctive Order, and Finding of Contempt Against Angel Amor Trujillo* (Docket #__) (the “Stipulated Motion”), and the Court having reviewed the Stipulated Motion, and finding that good cause exists for grating the relief requested therein,

IT IS HEREBY ORDERED that the Stipulated Motion is **GRANTED**.

IT IS FURTHER ORDERED that **ANGEL AMOR TRUJILLO**, along with any agents, successor, or assigns (including any entity owned or controlled by her - whether now or in the future) is **permanently enjoined** from: (a) providing any services, directly or indirectly, as a debt relief agency, as that term is defined in 11 U.S.C. §101(12A), or providing any bankruptcy assistance as that term is defined in 11 U.S.C. §101(4A) to an entity as that term is defined by 11 U.S.C. §101(15); (b) conducting any business or being involved in the coordination of any business that is in any way related to bankruptcy; (c) acting as a bankruptcy petition preparer as that term is defined by 11 U.S.C. §110(a); (d) performing, supervising, or otherwise participating in or facilitating in any way any person or entity in acting as a bankruptcy preparation preparer; (e) receiving any money for the preparation of any bankruptcy document; (f) inputting any information into bankruptcy forms for any person; (g) providing any information about bankruptcy to any person, or (h) allowing any person to utilize any bankruptcy software in her name, possession, or control.

IT IS FURTHER ORDERED that **BRENNAH DARLENE MARES**, along with any agents, successor, or assigns (including any entity owned or controlled by her - whether now or in the future) is **permanently enjoined** from: (a) providing any services, directly or indirectly, as a debt relief agency, as that term is defined in 11 U.S.C. §101(12A), or providing any bankruptcy assistance as that term is defined in 11 U.S.C. §101(4A) to an entity as that term is defined by 11 U.S.C. §101(15); (b) conducting any business or being involved in the coordination of any business that is in any way related to bankruptcy; (c) acting as a bankruptcy petition preparer as that term is defined by 11 U.S.C. §110(a); (d) performing, supervising, or otherwise participating in or facilitating in any way any person or entity in acting as a bankruptcy preparation preparer; (e) receiving any money for the preparation of any bankruptcy document; (f) inputting any information into bankruptcy forms for any person; (g)

providing any information about bankruptcy to any person, or (h) allowing any person to utilize any bankruptcy software in her name, possession, or control.

IT IS FURTHER ORDERED that the Injunctive Provisions of the stipulated agreement, as set out in the Stipulated Motion, shall prohibit the above described conduct, regardless of whether any service or product is provided for a fee, barter, trade, or for free.

IT IS FURTHER ORDERED that the *Order Approving Stipulated Resolution of Untied States Trustee's Motion to Disgorge Fees, Award Damages, Impose Fines and Penalties, and Enforce Consent Order for Injunctive Relief Against Angel Amor Trujillo* entered in the bankruptcy case of Pamela Sue Klein (Case No. 18-12929 JGR, Docket #107) shall have full force and effect, and Ms. Trujillo has waived any assertion or argument that she did not consent to the entry of that order.

IT IS FURTHER ORDERED that Ms. Mares and Ms. Trujillo shall submit a signed and notarized affidavit to the UST every six (6) months for a period of three (3) years affirming that they remain in compliance with the Injunctive Provisions, as set out in the Stipulated Motion. The Injunctive Provisions of this agreement are permanent and continue following the expiration of the requirement to provide the UST with these affidavits.

IT IS FURTHER ORDERED that the signed and notarized affidavits shall include a verbatim recitation of the injunctive provisions, as set out in the Stipulated Motion, and shall affirm that none of those injunctive provisions have been violated.

IT IS FURTHER ORDERED that the signed and notarized affidavits shall be due and submitted according to the following schedule, and must be received by the UST no later than thirty (30) days after these dates: (1) May 1, 2023; (2) October 1, 2023; (3) May 1, 2024; (4) October 1, 2024; (5) May 1, 2025; (6) October 1, 2025.

IT IS FURTHER ORDERED that the signed and notarized affidavits shall be received by the UST by mail or hand delivery to the following address: Office of the United States Trustee, Region 19, Attn: R. Samuel Boughner, 1961 Stout St., Ste. 12-200, Denver, CO 80294.

IT IS FURTHER ORDERED that Ms. Trujillo shall be obligated, consistent with the terms of the agreement set out in the Stipulated Motion, to pay a fine of \$30,000 to the United States Trustee for Region 19. Of that total \$30,000 fine, Ms. Trujillo must pay \$6,000 within thirty (30) days of the entry of the stipulated order. Provided Ms. Trujillo makes each of the payments required herein, and remains in compliance with the other requirements of this agreement, the UST shall not seek to enforce or collect the remaining \$24,000 of the fine.

IT IS FURTHER ORDERED that if Ms. Trujillo violates this Order, including the payment requirements, injunctive provisions, or affidavit requirements, the full amount of the \$30,000 fine, less any payments previously received, shall become immediately due and owing to the UST.

IT IS FURTHER ORDERED that if Ms. Trujillo violates this Order, the UST may initiate any collection action, contempt proceeding, or other enforcement action as the UST deems appropriate. If the UST prevails in any action against Ms. Trujillo that is based on a

violation of this order, the UST shall be entitled to recover any reasonable attorney fees and costs associated with that enforcement action.


IT IS FURTHER ORDERED that if Ms. Mares violates this Order, the UST may initiate any contempt proceeding, or other enforcement action as the UST deems appropriate. If the UST prevails in any action against Ms. Mares that is based on a violation of the order approving this agreement, the UST shall be entitled to recover any reasonable attorney fees and costs associated with that enforcement action.

IT IS FURTHER ORDERED that nothing in this order shall prohibit the UST from pursuing relief against Ms. Trujillo or Ms. Mares based on facts not presently known to the UST and/or not part of the present action.

IT IS FURTHER ORDERED that nothing in this order shall prohibit any person or entity not a party to the Stipulated Motion from pursuing any relief to which they may be entitled.

IT IS FURTHER ORDERED that the United States Bankruptcy Court for the District of Colorado shall have and retain exclusive jurisdiction to resolve any dispute over the meaning, intent, or enforcement of this agreement.

BY THE COURT:



Hon. Michael E. Romero, Judge
United States Bankruptcy Court