

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

FEDERAL TRADE COMMISSION

Plaintiff,

v.

GOVASSIST LLC, a limited liability company;

ENTRY LLC, a limited liability company;

SCOTT ZUCKERMAN, individually and as an  
officer of GOVASSIST LLC and ENTRY LLC,

Defendants.

Case No. 3:26-cv-1675

**COMPLAINT FOR PERMANENT  
INJUNCTION, MONETARY  
JUDGMENT, AND OTHER RELIEF**

Plaintiff, the Federal Trade Commission (“FTC” or “Commission”), for its Complaint alleges:

1. The FTC brings this action for Defendants’ violations of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), the FTC’s Trade Regulation Rule on Impersonation of Government and Businesses (“Impersonation Rule”), 16 C.F.R. Part 461, and Section 521 of the Gramm-Leach-Bliley Act (“GLB Act”), 15 U.S.C. § 6821. Defendants’ violations relate to their deceptive marketing and sale of United States passports and passport services. For these violations, the FTC seeks relief, including a permanent injunction, monetary relief, and other relief, pursuant to Sections 13(b) and 19 of the FTC Act, 15 U.S.C. §§ 53(b) and 57b, and Section 522(a) of the GLB Act, 15 U.S.C. § 6822(a).

**SUMMARY OF THE CASE**

2. Defendants have operated an impersonation scheme to induce hundreds of thousands of consumers to pay for promised United States passports and passport-related services by creating the appearance that Defendants are the federal government or are affiliated with it. Defendants use deceptive advertising, in response to consumers’ keyword searches, to

promote a series of their deceptive websites purporting to offer United States passports and visas, or services related to obtaining United States passports and visas. Defendants' impersonation scheme has led consumers to waste time and money on Defendants' purported offerings.

3. Defendants have used misleading paid advertisements on Google that appeared prominently above the official U.S. Department of State (the "State Department") website in search results, and website URLs, including "IVS.us," "Entry.com," and "GovAssist.com" to deceive consumers. When consumers run Google searches with such phrases as "apply for a new passport," "get a new passport," "how can I renew my passport," "passport renewal," and "passport renewal online," Google routinely displays Defendants' IVS.us and Entry.com online passport application pages as top sponsored results. Such search results shape consumers' net impression that Defendants are the government and frame consumers' interactions with Defendants going forward. By positioning their deceptive websites, which use misleading language and images to suggest they are official government or government-affiliated websites, and Google advertisements where consumers would expect to find and access official federal government websites and services, Defendants led consumers to believe that they were dealing with the federal government or an authorized government-affiliated provider. But Defendants are neither the federal government, nor an authorized government-affiliated provider of passport-related services.
4. Defendants reinforced their deceptive advertising with additional misrepresentations concerning the nature, scope, and speed of the passport services they offered. Their deceptive websites represented that consumers could obtain United States passports quickly and directly from Defendants or specialized passport-related services offered only

by Defendants.

5. Defendants attempted to conceal their scheme from consumers by using purported positive consumer reviews to make their passport-related services appear legitimate. However, Trustpilot, an online review platform where the public can post customer reviews and search for reviews, feedback, and a rating of companies and websites, identified numerous purported positive reviews of Defendants' companies and websites as fabricated.
6. Consumers seeking United States passports and passport-related services relied on Defendants' representations in deciding whether to use Defendants' websites rather than applying directly through official government channels. As a result, through these and related misrepresentations, Defendants induced consumers to provide their financial account information to authorize payment, as well as provide other sensitive information required for the application process.
7. Defendants' deceptive conduct has caused ongoing consumer harm. No consumer received a passport from Defendants without taking additional, independent action beyond Defendants' services, such as an in-person appointment, mailing in a prior passport, or submitting an online passport renewal application to the State Department. Numerous consumers who expected to receive a passport from Defendants have complained their passports never arrived. And many consumers who paid for United States passports received only a copy of State Department passport application forms – forms which were in some instances incomplete. Even in those instances where consumers eventually received passports from the State Department, they spent needless time and money on Defendants' services, which they would not have done if they had known Defendants are unaffiliated with the federal government. Consumers who paid for Defendants' services paid at least twice as much as they would have if they applied directly through the State

Department. Through the deceptive tactics outlined herein, Defendants have caused at least \$40 million in consumer injury since October 2023.

### **JURISDICTION AND VENUE**

8. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1337(a), and 1345.
9. Venue is proper in this District under 28 U.S.C. §§ 1391(b)(1), (b)(2), (c)(1), (c)(2), and (d).

### **PLAINTIFF**

10. The FTC is an agency of the United States Government created by the FTC Act which authorizes the FTC to commence this district court civil action by its own attorneys. 15 U.S.C. §§ 41–58. The FTC enforces Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), which prohibits unfair or deceptive acts or practices in or affecting commerce. The FTC also enforces the Impersonation Rule, 16 C.F.R. Part 461, which prohibits impersonation of the government and businesses. The FTC also enforces Section 521(a) of the GLB Act, 15 U.S.C. § 6821(a), which prohibits obtaining a person’s financial information by making false, fictitious, or fraudulent statements.

### **DEFENDANTS**

11. Defendant GovAssist LLC (“GovAssist”) is a Puerto Rico limited liability company with its street address listed with the Puerto Rico Department of State at 1413 Ave Ponce de Leon, Suite 401-0701, San Juan, PR 00907 and its mailing address listed at 5900 Isla Verde Ave Suite 164, Carolina, PR 00979. Currently, GovAssist conducts business at 18 Calle 1, Ste 401, Guaynabo, PR 00968. GovAssist transacts or has transacted business in this District and throughout the United States. At all times relevant to this Complaint, acting alone or in concert with others, GovAssist has advertised, marketed, distributed, or

sold United States passports and passport services to consumers throughout the United States.

12. Defendant Entry LLC (“Entry”) is a Wyoming limited liability company with its street address listed with the Wyoming Secretary of State at 30 N Gould St Ste N, Sheridan, WY 82801. Entry shares the same business address as GovAssist – 1413 Ave Ponce de Leon, Suite 401-0701, San Juan, PR 00907 – and it also conducts business with GovAssist at 18 Calle 1, Ste 401, Guaynabo, PR 00968. Entry transacts or has transacted business in this District and throughout the United States. At all times relevant to this Complaint, acting alone or in concert with others, Entry has advertised, marketed, distributed, or sold United States passports and passport services to consumers throughout the United States.
13. Defendant Scott Zuckerman is the sole member and 100% owner of GovAssist and Entry. At all times relevant to this Complaint, acting alone or in concert with others, he has formulated, directed, controlled, had the authority to control, or participated in the acts and practices described in this Complaint. Zuckerman is an authorized signatory authority on Defendants’ bank accounts and merchant accounts and is an account contact for Defendants’ telecommunication services. Zuckerman resides in this District and, in connection with the matters alleged herein, transacts or has transacted business in this District and throughout the United States.

#### **COMMON ENTERPRISE**

14. Defendants GovAssist LLC and Entry LLC (collectively, “Corporate Defendants”) have operated as a common enterprise while engaging in the unlawful acts and practices alleged below. Corporate Defendants have conducted the business practices described below through interrelated companies that have common ownership, the same managing member, business functions, employees, office locations, and commingled funds. Zuckerman has

represented that GovAssist is a DBA of Entry. Because these Corporate Defendants have operated as a common enterprise, both of them are liable for the acts and practices alleged below.

### **COMMERCE**

15. At all times relevant to this Complaint, Defendants have maintained a substantial course of trade in or affecting commerce, as “commerce” is defined in Section 4 of the FTC Act, 15 U.S.C. § 44.

### **DEFENDANTS’ BUSINESS ACTIVITIES**

16. Defendants use deceptive online advertising, in response to consumers’ keyword searches on Google, to promote a series of websites purporting to offer United States passports and visas, or services related to obtaining United States passports and visas.
17. Defendants’ websites include govassist.com, entry.com, ivs.us, quickpassport.com, travelassist.us.com, usvisaconnection.com, tvspassports.com, and invitationletter.com.
18. Defendants use misleading and deceptive language and images in their advertising and website design to impersonate the United States government, diverting consumers seeking new and renewed passports to Defendants’ sites instead of the State Department website.
19. Consumers purchase Defendants’ services because they mistakenly believe they are submitting their applications directly to the government. Consumers have stated they would not have purchased Defendants’ services if they had understood Defendants are not the government.
20. Defendants also make false and misleading statements regarding the services they offer, such as promising consumers will get a passport via Defendants’ services without any additional action required; promising consumers will get their passport within various abbreviated time frames, all of which are faster than the State Department’s stated time frames; and misleading consumers as to the total cost of Defendants’ services and of

applying for a passport.

21. Defendants represent they have received numerous positive reviews on a consumer review website, Trustpilot, and that those reviews reflect the authentic experiences of real customers. However, numerous purported positive consumer reviews of Defendants on Trustpilot's platform were fabricated.

***Background on Issuance of United States Passports***

22. The State Department has exclusive authority to issue U.S. passports. The State Department operates a website at [travel.state.gov](https://travel.state.gov) to assist U.S. citizens with applying for a new passport or applying to renew or replace a previously-issued passport.
23. In order to apply for a new, first-time passport, adults must apply in-person at a passport acceptance facility, such as a post office, court, library, or other local government office. First-time applicants must complete a free application form accessible through the State Department website, and then apply for their passport by bringing the completed form with proof of citizenship, photo ID, and a passport photo to an authorized passport acceptance facility, where a passport agent will verify ID, administer an oath, and have the applicant sign their application. At that time, the applicant must pay a \$130 passport application fee and a \$35 facility acceptance fee. After the applicant signs and submits their application, the facility will mail it to the State Department; it may take two weeks for the application to reach the State Department. Once the State Department receives the application, processing may take four to six weeks, and once the application is approved and the passport is issued, mailing it to the recipient may take up to two weeks. In sum, the State Department advises the routine process typically takes eight to ten weeks.
24. The State Department offers three options to get a passport faster than the routine process: emergency (life-or-death), urgent, and expedited. Applicants may qualify for an

emergency appointment if they need to travel abroad within 14 days because an immediate family member outside of the United States has died, is dying, or has a life-threatening illness or injury. Applicants may qualify for urgent processing if they are traveling in less than two to three weeks and make an appointment at a passport agency within 14 days of international travel. Finally, applicants may seek expedited service if they are traveling in less than six weeks from the application submission date; according to the State Department, expedited service takes two to three weeks, not including mailing times. Expedited service requires an additional \$60 expedite fee. Applicants may also pay extra for faster shipping, both when mailing the application to the State Department and when receiving their passport in the mail.

25. Some consumers who have already received a passport may be eligible to renew their passport online or by mail. The online application takes about 10 minutes to complete and is free. Upon submission, the applicant must still pay the \$130 application fee, and after submission, processing takes around four to six weeks. The online passport renewal application requires an electronic signature and self-submission attestation. The State Department therefore requires that online passport renewal applicants may only sign and submit applications on their own behalf. Applicants submitting a passport renewal application by mail must also provide their most recent passport, and processing may take longer due to the time it takes for the State Department to receive the application. Applicants may also apply to renew a passport in person, similar to the in-person application process for a new passport.
26. The only official, authorized place to renew a passport online is [opr.travel.state.gov](https://opr.travel.state.gov). The State Department warns consumers to avoid unofficial online renewal sites, that such sites are potentially fraudulent, and that they add extra fees and jeopardize personal data. The

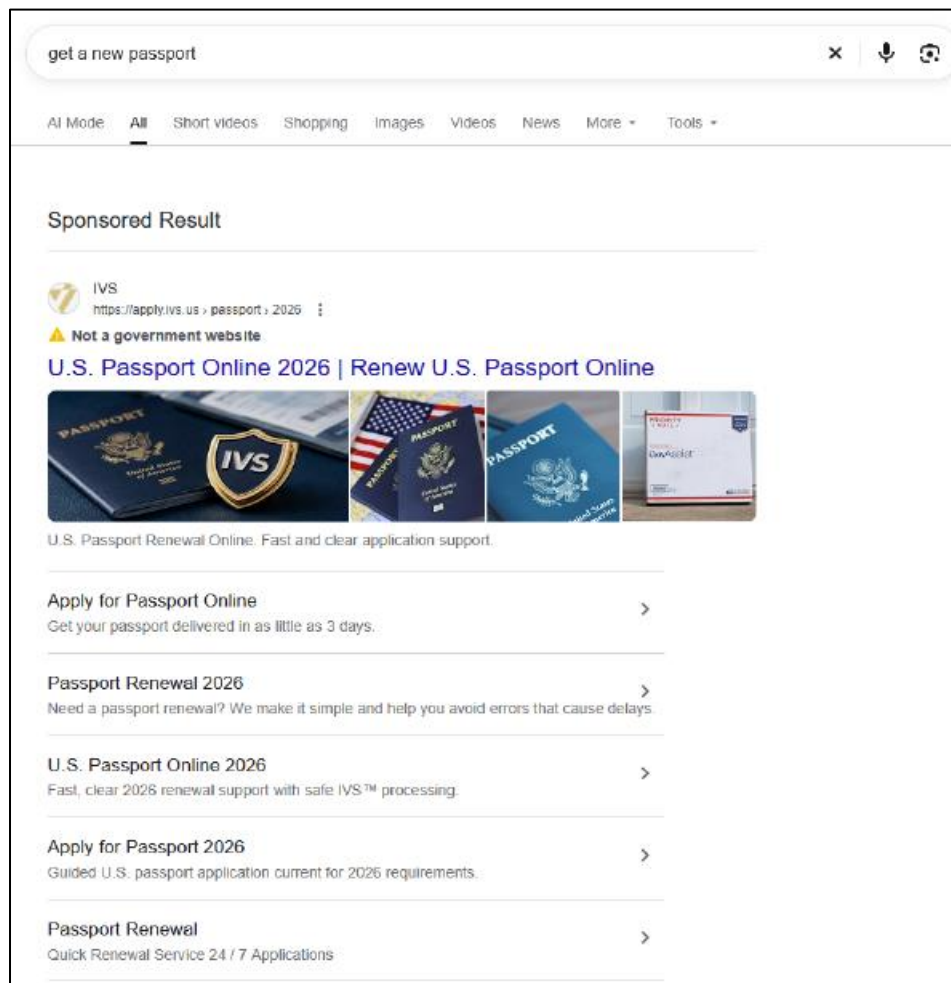
State Department further advises that even if a company has “Gov” in its name, it is not authorized to accept or process online renewal applications and advises that consumers should always check they are on a website ending in .gov, not .com, .us, or .org.

27. Private firms may register with the State Department as courier companies, authorizing them to submit applications and pick up passports for customers. The State Department does not allow third-party courier companies to submit online applications on behalf of passport applicants however, and it advises consumers that using a courier company will not enable applicants to receive their passport faster than applying directly through the State Department.
28. Defendants are not authorized couriers registered with the State Department, nor are they affiliated with the State Department in any way.

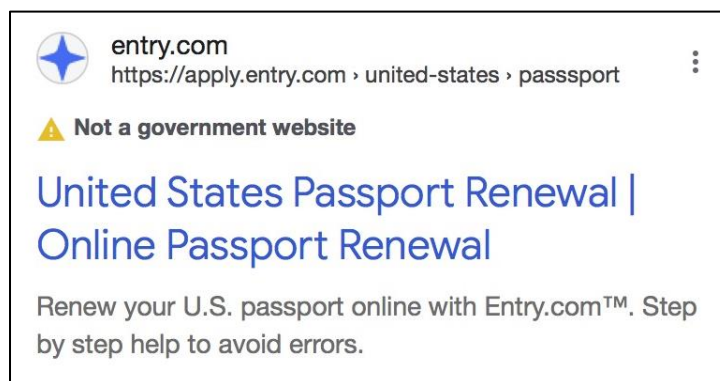
***Defendants’ Government Impersonation Scheme***

29. Since at least October 2023, Defendants have operated unlawful and deceptive websites that purport to offer passport and visa renewal and application services to consumers.
30. Defendants worked with Google’s platform to create and disseminate deceptive advertisements designed to entice consumers to their websites. In numerous instances, consumers conduct an Internet search to obtain information on how to apply for a new passport or renew an existing passport. As mentioned above, Google keyword searches such as “apply for a new passport,” “get a new passport,” “how can I renew my passport,” “passport renewal,” and “passport renewal online” all return Defendants’ IVS.us and Entry.com online passport application pages as top sponsored results, often appearing above the State Department website. Such search results shape consumers’ net impression that Defendants are the government and frame consumers’ interactions with Defendants going forward.

31. Defendants' Google advertisements also solicit consumers seeking immigration and tourist visa applications through Internet searches.
32. Defendants' Google advertisements feature several elements which mislead consumers into believing Defendants are a government entity. For example, the Google advertisements feature:
  - a. Official-looking stock images of passports and American flags;
  - b. Language identical or substantially similar to the State Department website language (e.g., both the advertisement for IVS.us and the State Department language in the Google search results feature the phrase "Renew Your Passport Online");
  - c. Links to "Passport Renewal" and "Quick Renewal Service," as well as links promising "Apply for Passport Online," suggesting consumers may apply for a passport directly through Defendants' websites;
  - d. A badge with the abbreviation "IVS" on it and the URL "apply.ivs.us" suggesting a connection to a government agency because (1) the badge conveys official authority, (2) "IVS" is reminiscent of "INS," the Immigration and Naturalization Service, a prior government agency handling legal immigration in the United States, and (3) in context, the URL ending in ".us" suggests affiliation with the government; and
  - e. An image of a priority mail package with the GovAssist logo appearing printed on the package in conjunction with the United States Postal Service logo, again suggesting official government affiliation.
33. For example, the following Google search results for "get a new passport" appeared on September 16, 2026:



34. And the following Google search results for “online passport renewal” appeared on October 5, 2026:



35. Numerous consumers seeking passports believed Defendants were affiliated with the government because, in addition to their misleading content, Defendants' Google advertisements frequently appear at or near the top of consumers' Google search results.

As depicted in the search result examples in Paragraphs 33 and 34, since at least April 2026, some of Defendants' Google advertisements include the line "Not a government website" in significantly smaller, black font above larger blue eye-catching advertisement text such as "US Passport Online 2026" or "United States Passport Renewal."

36. The Google advertisements route consumers who click on them directly to the IVS.us and Entry.com passport application pages, rather than the homepages. While at least one of the homepages suggests the website is for a document processing business unaffiliated with the government (GovAssist.com features a large header stating "AI-powered document processing at scale"), the passport application pages—the pages consumers actually see if they click on Defendants' advertisements—feature several elements that reinforce consumers' understanding they are applying directly through the government. For example:

- a. Header text that states "everything you need to apply for, renew, or replace your United States passport;"
- b. A summary chart that lists the "Issuing Agency" as "U.S. Department of State;"
- c. An American flag seal with a large header stating "United States Passport" next to an image of the Statue of Liberty; and
- d. A large blue button stating "Get My Passport."

37. When consumers click on Defendants' Google advertisements for IVS.us, they are redirected to [apply.ivs.us/passport](https://apply.ivs.us/passport). The following information appeared on that landing page on April 27, 2026:

IVS by GovAssist United States Passport

My Application Help

1. Eligibility

## United States Passport

Skip the paperwork. We prep, review, and ship for you.

What do you need? \*

Renew New passport Lost or damaged Name change

First-time — child or adult

Processing speed

Smart Processing - 3-6 weeks

You can change this later before you submit.

Get My Passport →

38. When consumers click on Defendants' Google advertisements for Entry.com, they are redirected to [apply.entry.com/passport](https://apply.entry.com/passport). The following information appeared on that landing page on April 27, 2026:

entry

Passports Visas Immigration Travel Tools IDP Insights

United States Get Started

Passport Services

## United States Passport

Everything you need to apply for, renew, or replace your United States passport — fees, timelines, documents, and direct links to official resources.

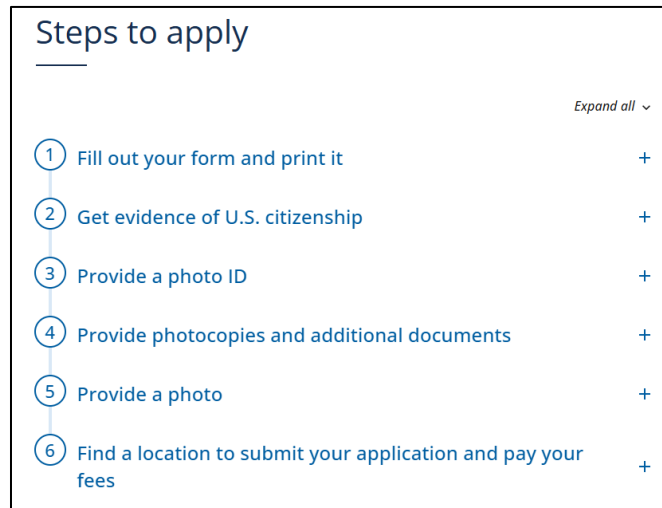
Change passport country

Apply with Entry →

### United States passport at a glance

|                                            |                                  |                                   |
|--------------------------------------------|----------------------------------|-----------------------------------|
| ISSUING AGENCY<br>U.S. Department of State | STANDARD PROCESSING<br>4-6 weeks | EXPEDITED PROCESSING<br>2-3 weeks |
| VALIDITY<br>10 years                       | STANDARD FEE<br>\$130 USD        | EXPEDITED FEE<br>\$60 USD         |

39. On GovAssist.com, Defendants list a K Street address in Washington, D.C., rather than their operating address in Puerto Rico, further suggesting affiliation with the federal government.
40. Some elements of Defendants' websites are also very similar to the design and official-looking elements of the State Department websites, reinforcing consumers' understanding they are applying directly through an official government website, including:
- a. "How to Apply" steps that resemble the official steps found on the State Department website. For example, the following information appeared on the travel.state.gov passport information page on September 29, 2026:



And the following information appeared on the Entry.com passport application page

on April 27, 2026.

The image is a screenshot of a website section titled "How to apply" with a clipboard icon. It contains four numbered steps in a vertical list:

- 1 Gather documents**  
Collect proof of citizenship, a valid photo ID, and a passport-sized photo.
- 2 Complete the application**  
Fill out the official application form (or let Entry handle it for you).
- 3 Submit & pay fees**  
Submit your application in person or by mail along with the required fees.
- 4 Receive your passport**  
Your passport will be mailed to you once processed — track it online.

Below this list is a section titled "Required documents" in a light blue background. It contains five items, each with a green checkmark icon in a circle:

- Form DS-11
- Proof of U.S. citizenship (e.g., birth certificate)
- Photo ID
- Passport photo
- Photocopies of citizenship and ID documents

- b. Four levels of expedited service, mirroring the four levels offered on the State Department website. For example, the following information appeared on the [travel.state.gov](https://travel.state.gov) information page about how to get a passport faster on September 29,

2026.

### Life-or-death and urgent travel

If you qualify for one of these options, you need to make an appointment at a [passport agency or center](#).

#### Life-or-death: travel in less than 14 days

You may qualify for an emergency appointment if you need to travel abroad in the next 14 days because your immediate family member outside of the United States has died, is dying or in hospice care, or has a life-threatening illness or injury.

[Check eligibility](#)

#### Urgent: travel in less than 2-3 weeks

If you are traveling in less than 2-3 weeks, make an appointment at a passport agency or center when you are within 14 calendar days of your international travel date, or 28 days if you need a foreign visa.

[Make an appointment](#)

### Expedited: travel in less than 6 weeks

Choose this service if you are traveling in less than 6 weeks from the date you submit your application.

Expedited service takes 2-3 weeks and does not include mailing times. Mailing times may add 2 weeks to the total time to get your passport.

You can [expedite at an acceptance facility](#) or [expedite a renewal by mail](#).

You will need to pay a \$60 expedite fee in addition to the standard application fee.

### Routine: travel in 6 weeks or more

Choose this service if you are traveling over 6 weeks from the date you submit your application.

Routine service takes 4-6 weeks and does not include mailing times. Mailing times may add 2 weeks on to the total time to get your passport.

You can apply for routine service at an [acceptance facility](#) if you are applying for the first time or for a child under 16. If you are eligible to renew, you can renew [online](#) or [by mail](#).

And the following information appeared on the IVS.us passport application page on

April 27, 2026.

**Transparent New Passport pricing**  
Choose the level of support that's right for you. No hidden fees.

| Standard Processing                                                                                                                        | Smart Processing (MOST POPULAR)                                                                                             | Rush Expediting                                                                                                         | Urgent Expediting                                                                                                         |
|--------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|
| <b>\$119</b> service fee                                                                                                                   | <b>\$169</b> service fee                                                                                                    | <b>\$349</b> service fee                                                                                                | <b>\$499</b> service fee                                                                                                  |
| 6-8 weeks<br>+ \$29 shipping                                                                                                               | 3-5 weeks<br>+ \$29 shipping                                                                                                | 6-10 business days<br>Shipping included                                                                                 | 3-4 business days<br>Shipping included                                                                                    |
| <ul style="list-style-type: none"> <li>✓ Pre-filled application</li> <li>✓ Passport photo included</li> <li>✓ Pre-paid envelope</li> </ul> | <ul style="list-style-type: none"> <li>✓ We handle everything</li> <li>✓ Photo included</li> <li>✓ Expert review</li> </ul> | <ul style="list-style-type: none"> <li>✓ Priority handling</li> <li>✓ Expert review</li> <li>✓ Fast shipping</li> </ul> | <ul style="list-style-type: none"> <li>✓ VIP handling</li> <li>✓ Dedicated agent</li> <li>✓ Fastest turnaround</li> </ul> |

**Government New passport fee** **\$165.00**  
Paid separately to the U.S. Department of State — not included in the service fees above.

c. Defendants' price points are very close to those the State Department charges (e.g. \$169 vs. \$165).

41. While Defendants' websites have at times included some disclaimer language that they are not the government, the disclaimers are ineffective. Defendants display disclaimers on parts of the website consumers never see if they arrive through the linked Google advertisement. Even when the disclaimers are on the landing pages linked to Defendants' Google advertisements, they are inconspicuously placed in page footers. Defendants have also displayed disclaimer language in small font and in odd font colors that make the disclaimer very difficult to read.
42. For example, the following information appeared on [apply.ivs.us/passport](https://apply.ivs.us/passport) on April 27, 2026:

© 2026 GovAssist LLC. All rights reserved.  
Private preparation service. Not affiliated with, endorsed by, or operated by the U.S. government. Government fees are paid separately to the U.S. Department of State.

43. And, similarly, the following information appeared on [apply.entry.com/passport](https://apply.entry.com/passport) on April

27, 2026:

© 2026 Entry LLC. All rights reserved. Entry is a private company and not affiliated with any government agency.

44. Defendants use multiple government references in their company names and website addresses—including those listed in Google advertisements—to bolster their impersonation, for example:
- a. The use of “Gov” in “GovAssist;”
  - b. The use of “.us” in the “IVS.us” URL;
  - c. The use of “IVS” as an acronym with a seal at the top of the page, reminiscent of “INS,” the Immigration and Naturalization Service, which was a prior government agency handling legal immigration in the United States; and
  - d. The use of “Entry,” reminiscent of “Global Entry,” a traveler program offered by the U.S. Customs and Border Protection agency.
45. Once a consumer has completed an application and submitted payment, a confirmation screen appears stating “Your passport application has been submitted.” In fact, while the consumer has submitted their information to Defendants, neither the consumer nor Defendants have at this stage submitted the passport application to the State Department.
46. Next, Defendants direct the consumer to their Passport Photo tool. On this page, Defendants have no disclaimers stating they are not the government, and the page states “we need a fresh photo of your face taken now.” Many consumers believe at this point they are submitting a passport photo to the federal government with their passport application.
47. After photo submission, Defendants automatically redirect consumers to a “My Passport” customer portal, which has no disclaimers stating Defendants are not affiliated with the government, and which prominently states “application has been submitted for

processing.” The “shipping” tab in Defendants’ customer portal also states “your passport will be mailed to this address,” “this is where your new passport will be sent,” and “your passport will be shipped via USPS Priority Mail with tracking,” all of which further deceive customers into thinking they have just applied for a passport via the federal government.

***Defendants’ Deceptive Service Promises***

48. Defendants further deceived numerous consumers by making false service promises.
49. Defendants mislead consumers into believing they can directly issue U.S. passports. In fact, they cannot.
50. In many instances consumers receive only a completed passport application they could have obtained for free from the State Department website.
51. Some consumers may ultimately receive a passport from Defendants’ services, but only after spending needless time and unnecessary expense on the process, and not within the promised delivery time.
52. Many consumers seek refunds or initiate chargebacks upon learning they have not in fact applied for a passport through Defendants’ websites.
53. On April 27, 2026, Defendants claimed on Entry.com that their services started at \$89, when in fact the pricing listed on the Entry.com application page ranged from \$119 to \$499. The lowest price Defendants offer on Entry.com or IVS.us is \$119 plus a \$29 shipping fee (totaling \$148).
54. Defendants charge a service fee displayed in large, bold text, with a small grey disclaimer stating the applicant must also pay \$165 to the State Department separately. Based on Defendants’ representations, some consumers do not understand they will have to pay again when consumers subsequently need to submit their application to the State

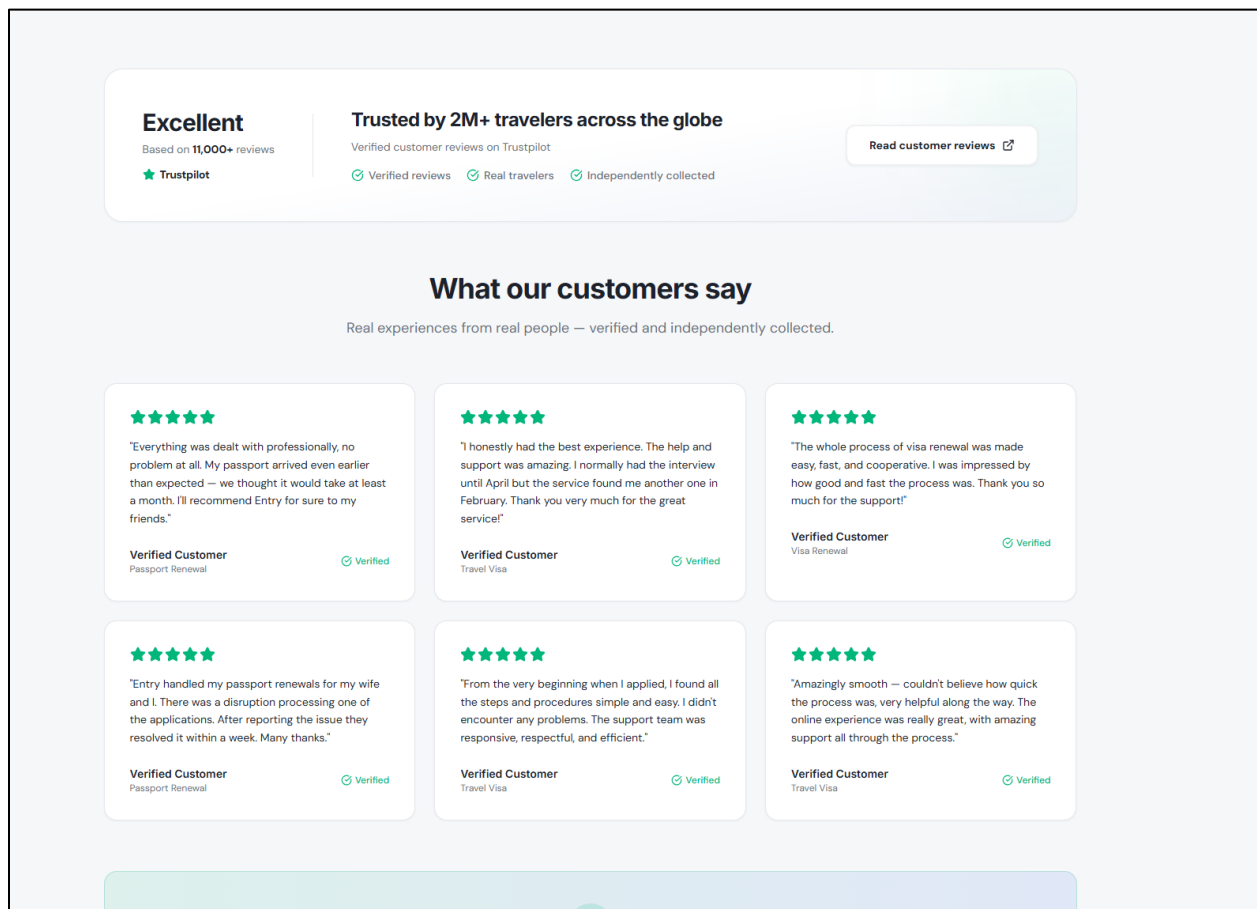
Department.

55. Defendants claim their services allow consumers to “skip the paperwork. We prep, review, and ship for you.” In fact, Defendants merely prepare application paperwork for new passport customers.
56. Defendants offer three levels of expedited service, promising passport delivery in 3-6 weeks, 6-10 business days, or 3-4 business days. However, the latter two options are false because the fastest expedited service offered by the only source for passports – the U.S. State Department – is a 14-day delivery that is only available in particular circumstances and is not available through third parties. As the State Department explains on its website, using a third-party company to prepare a passport application will not result in expedited results.
57. Defendants’ Google advertisements also include deceptive statements promising results they cannot deliver, for example “get your passport delivered in as little as 3 days,” as shown in paragraph 33.
58. To entice consumers to pay for upgraded service options, Defendants promise “faster turnaround, white-glove handling,” and “priority queue placement,” which are all false promises, because Defendants’ service cannot impact the speed of State Department processing.
59. Once a consumer begins completing an application for a new passport on IVS.us, there is only a small, light gray disclaimer at the very bottom of the page stating the site is not affiliated with the U.S. government, as shown in paragraph 42.
60. In addition to their deceptive delivery time claims in online advertisements and throughout their application process, at checkout Defendants again deceive consumers with misleading delivery estimates.

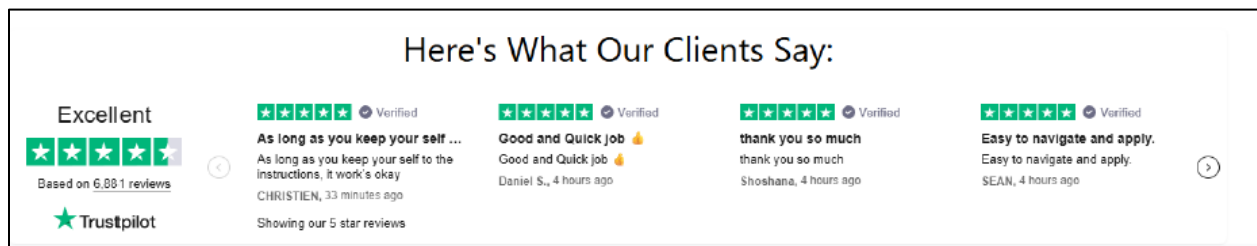
61. For example, in the checkout flow, Defendants have provided an estimated delivery timeline of 31-49 days until delivery, which supposedly “includes 3-6 weeks government processing.” In fact, the applicant does not receive a passport; instead, in some instances the applicant receives passport application forms from Defendants 23 days after applying. Even if the applicant submitted those forms at an in-person new passport appointment the day they received them, the State Department’s stated process would still take eight to ten weeks, as described in paragraph 23. Therefore, the earliest they could have gotten a passport from the State Department would have been a month later than Defendants’ estimated delivery window. Far from expediting the application, waiting for almost a month after applying through Defendants’ websites only to receive application forms delays the process significantly.
62. Moreover, the promised timeline of 31-49 days is at least a week faster than the State Department advises it requires to provide a passport, even if the applicant applied in person the same day they submitted their application to GovAssist. Considering Defendants do not even provide the customer their application until three weeks later, the promised timeline is unachievable.

***Defendants’ Reliance on Fabricated Consumer Reviews***

63. Defendants have misrepresented on their website the number of positive reviews their companies and websites have on Trustpilot.
64. Defendants have prominently touted that they have an “excellent rating” based on numerous reviews on the review platform Trustpilot, and Defendants have featured examples of five-star reviews as representative of their customer reviews on Trustpilot overall.
65. For example, on May 6, 2026, the following appeared on Defendants’ Entry.com website:



66. And, for example, on July 16, 2025, the following appeared on the GovAssist.com website:



67. However, numerous purported positive reviews of Defendants' companies and websites were not truthful reviews by Defendants' actual customers, but they were instead fabricated. Trustpilot flagged many such reviews as fabricated and removed them after investigation. Trustpilot independently identified hundreds of reviews as fabricated, based on a variety of factors, including review content, IP addresses, device characteristics, and location data.

68. In May 2025, Trustpilot notified Defendants that it had found and removed abnormally high numbers of fake reviews. Even though Defendants responded to other communications from Trustpilot concerning violation of Trustpilot's policies, they failed to dispute Trustpilot's concerns about their fake reviews.

***Consumer Harm***

69. Defendants use the misrepresentations they make about government affiliation and the services they provide to induce consumers to provide payment information, enabling Defendants to wrongfully charge consumers \$145 each, on average.
70. Some consumers lost as much as \$499 per application submitted to Defendants, when paying for the "Urgent Expediting" option.
71. Many consumers purchase Defendants' services because they believe they are applying for a U.S. passport directly with the government. In fact, most of Defendants' customers never receive their passport through Defendants' services. None of Defendants' customers receive their passport in the manner or time frame advertised, nor at the cost Defendants advertise.
72. Consumers who apply for a new passport on Defendants' websites receive a partially completed application for a new passport, which they would then have to submit to the State Department at an in-person appointment with additional payment to actually apply. Despite Defendants' representations they can deliver a passport to their customers who pay for "Smart Processing" within three weeks, these customers do not even receive their completed passport application within three weeks, let alone an actual passport.
73. Consumers who apply to renew a passport on Defendants' websites must still either submit their own online renewal application on the State Department website, or mail in their renewal application with their prior passport, neither of which Defendants could complete

on their behalf without further action by the consumer.

74. Consumers who purchase Defendants' services because they believe Defendants are a government entity or are affiliated with the federal government pay at least twice as much as they would have if they applied directly through the State Department as they intended to do.
75. Some consumers who purchase Defendants' services in reliance on Defendants' misrepresentations about government affiliation and delivery timelines are unable to get a passport in time for scheduled travel, which they could have done if they had applied through the State Department as they intended. These unnecessary delays cost consumers even more time and money when resulting in trip cancellations.
76. In the three years preceding the filing of this Complaint, Defendants have collected at least \$40,000,000 from over 300,000 consumers through their unlawful government impersonation scheme.
77. Based on the facts and violations of law alleged in this Complaint, the FTC has reason to believe that Defendants are violating or are about to violate laws enforced by the FTC.

#### **VIOLATIONS OF THE FTC ACT**

78. Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), prohibits "unfair or deceptive acts or practices in or affecting commerce."
79. Misrepresentations or deceptive omissions of material fact constitute deceptive acts or practices prohibited by Section 5(a) of the FTC Act.

#### **Count I: Deceptive Impersonation Claims**

80. In numerous instances in connection with the advertising, marketing, promotion, or offering for sale, or sale of United States passports and passport services, Defendants represent, directly or indirectly, expressly or by implication, that:
  - a. Defendants are a federal agency, including the State Department; or

- b. Defendants are business affiliates of the State Department, authorized by the federal government to issue U.S. passports on the State Department's behalf or to submit applications and pick up passports for customers.
81. In fact, in numerous instances in which Defendants have made the representations described in Paragraph 80:
- a. Defendants are not a federal agency, including the State Department; and
  - b. Defendants are not approved by the State Department as business affiliates who are specifically authorized by the federal government to issue U.S. passports on the State Department's behalf or to submit applications and pick up passports for customers.
82. Therefore, Defendants' representations as described in Paragraph 80 are false or misleading and constitute a deceptive act or practice in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

### **Count II: Deceptive Passport Claims**

83. In numerous instances in connection with the advertising, marketing, promotion, or offering for sale, or sale of United States passports and passport services, Defendants represent, directly or indirectly, expressly or by implication, that:
- a. Defendants will obtain a U.S. passport for their customers in as little as three business days without regard for exceptional travel circumstances;
  - b. Customers will complete the passport application process and obtain a U.S. passport by applying online through Defendants' websites with no additional steps; or
  - c. Customers will obtain a U.S. passport by paying as little as \$89 to Defendants, with no additional costs.
84. In fact, in numerous instances in which Defendants have made the representations described in Paragraph 83:

- a. Defendants do not obtain a U.S. passport for their customers in as little as three business days without regard for exceptional travel circumstances;
  - b. Customers do not complete the passport application process and obtain a U.S. passport by applying online through Defendants' websites with no additional steps; and
  - c. Customers do not obtain a U.S. passport by paying as little as \$89 to Defendants, with no additional costs.
85. Therefore, Defendants' representations as described in Paragraph 83 are false or misleading and constitute a deceptive act or practice in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

**Count III: Deceptive Consumer Reviews**

86. In numerous instances in connection with the advertising, marketing, promotion, or offering for sale, or sale of United States passports and passport services, Defendants represent, directly or indirectly, expressly or by implication, that reviews of Defendants' businesses and websites are truthful reviews by Defendants' actual customers.
87. In fact, in numerous instances in which Defendants have made the representations described in Paragraph 86, the reviews of Defendants' businesses and websites are not truthful reviews by Defendants' actual customers.
88. Therefore, Defendants' representations as described in Paragraph 86 are false or misleading and constitute a deceptive act or practice in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

**VIOLATIONS OF THE TRADE REGULATION RULE ON  
IMPERSONATION OF GOVERNMENT AND BUSINESSES**

89. The Impersonation Rule, promulgated by the FTC under Section 18 of the FTC Act, 15 U.S.C. § 57a, became effective on April 1, 2024, and remains in full force and effect. The

Impersonation Rule is codified at 16 C.F.R. Part 461.

90. Section 461.2(a) of the Impersonation Rule prohibits “materially and falsely pos[ing] as, directly or by implication, a government entity or officer thereof, in or affecting commerce as commerce is defined in the Federal Trade Commission Act (15 U.S.C. [§] 44).”
91. Section 461.2(b) of the Impersonation Rule prohibits “materially misrepresent[ing], directly or by implication, affiliation with, including endorsement or sponsorship by, a government entity or officer thereof, in or affecting commerce as commerce is defined in the Federal Trade Commission Act (15 U.S.C. [§] 44).”
92. The Impersonation Rule defines “materially” to mean “likely to affect a person’s choice of, or conduct regarding, goods or services.” 16 C.F.R. § 461.1. The Impersonation Rule defines “government” to include “federal, state, local, and tribal governments as well as agencies and departments thereof.” *Id.*
93. Pursuant to Section 18(d)(3) of the FTC Act, 15 U.S.C. § 57a(d)(3), a violation of the Impersonation Rule constitutes an unfair or deceptive act or practice in or affecting commerce, in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a). Section 19(a)(1) of the FTC Act, 15 U.S.C. § 57b(a)(1), provides that the FTC may commence a civil action against “any person, partnership, or corporation” who “violates any rule . . . respecting unfair or deceptive acts or practices.” Section 19(b) of the FTC Act, 15 U.S.C. § 57b(b), provides that in any action commenced under Section 19(a)(1), the court “shall have jurisdiction to grant such relief as the court finds necessary to redress injury to consumers, including but not limited to rescission or reformation of contracts, the refund of money or return of property.”

#### **Count IV: Impersonation of the Government**

94. In numerous instances on or after April 1, 2024, in connection with the advertising,

marketing, promotion, offering for sale, or sale of United States passports and passport services, Defendants have materially and falsely posed as, directly or by implication, a government entity, or have materially misrepresented, directly or by implication, affiliation with a government entity.

95. Therefore, Defendants' representations as described in Paragraph 94 violate Sections 461.2(a) or (b) of the Impersonation Rule, 16 C.F.R. § 461.2(a), (b).

### **VIOLATIONS OF THE GRAMM-LEACH-BLILEY ACT**

96. Section 521 of the GLB Act, 15 U.S.C. § 6821, became effective on November 12, 1999, and remains in full force and effect. Section 521(a) of the GLB Act, 15 U.S.C. § 6821(a), prohibits any person from "obtain[ing] or attempt[ing] to obtain . . . customer information of a financial institution relating to another person—(1) by making a false, fictitious, or fraudulent statement or representation to an officer, employee, or agent of a financial institution; [or] (2) by making a false, fictitious, or fraudulent statement or representation to a customer of a financial institution."
97. The GLB Act defines "customer" to mean "with respect to a financial institution, any person (or authorized representative of a person) to whom the financial institution provides a product or service, including that of acting as a fiduciary." 15 U.S.C. § 6827(1). The GLB Act defines "customer information of a financial institution" as "any information maintained by or for a financial institution which is derived from the relationship between the financial institution and a customer of a financial institution and is identified with the customer." 15 U.S.C. § 6827(2). The GLB Act defines "financial institution" to include "any institution engaged in the business of providing financial services to customers who maintain a credit, deposit, trust, or other financial account or relationship with the institution." 15 U.S.C. § 6827(4)(A).

98. Section 522(a) of the GLB Act, 15 U.S.C. § 6822(a), empowers the FTC to enforce Section 521 of the GLB Act “in the same manner and with the same power and authority as the [FTC] has under the Fair Debt Collection Practices Act [FDCPA] . . . to enforce compliance with such Act.” Pursuant to Section 814(a) of the FDCPA, 15 U.S.C. § 1692l(a), a violation of the FDCPA is deemed an unfair or deceptive act or practice in violation of the FTC Act. Section 814(a) of the FDCPA further provides that all of the functions and powers of the FTC under the FTC Act are available to the FTC to enforce compliance by any person with the FDCPA, including the powers to enforce provisions of the FDCPA in the same manner as if the violation had been a violation of an FTC trade regulation rule. Section 19 of the FTC Act, 15 U.S.C. § 57b, authorizes this Court to grant such relief as the Court finds necessary to redress injury to consumers resulting from Defendants’ violations of the GLB Act, including but not limited to the rescission or reformation of contracts, and the refund of money or return of property.

**Count V:  
Use of False Statements to Obtain Customer Information**

99. In numerous instances in connection with the advertising, marketing, promotion, offering for sale, or sale of U.S. passports or passport services, Defendants make false, fictitious, or fraudulent statements or representations to customers of financial institutions to obtain or attempt to obtain customer information of a financial institution of those customers, such as bank account numbers and routing numbers, including by representing directly or indirectly, expressly or by implication, that:
- a. Defendants are a federal agency, including the State Department;
  - b. Defendants are business affiliates of the State Department, authorized by the federal government to issue U.S. passports on the State Department’s behalf or to submit applications and pick up passports for customers;

- c. Defendants will obtain a U.S. passport for their customers in as little as three business days without regard for exceptional travel circumstances;
- d. Customers will complete the passport application process and obtain a U.S. passport by applying online through Defendants' websites with no additional steps; or
- e. Customers will obtain a U.S. passport by paying as little as \$89 to Defendants, with no additional costs.

100. Therefore, Defendants' acts and practices as described in Paragraph 99 violate Section 521(a) of the GLB Act, 15 U.S.C. § 6821(a).

### **CONSUMER INJURY**

101. Consumers are suffering, have suffered, and will continue to suffer substantial injury as a result of Defendants' violations of the FTC Act, the Impersonation Rule, and the GLB Act. Absent injunctive relief by this Court, Defendants are likely to continue to injure consumers and harm the public interest.

### **PRAYER FOR RELIEF**

Wherefore, the FTC requests that the Court:

- A. Enter a permanent injunction to prevent future violations of the FTC Act, the Impersonation Rule, and the GLB Act;
- B. Award monetary and other relief within the Court's power to grant, including the rescission or reformation of contracts, the refund of money, or other relief necessary to redress injury to consumers; and
- C. Award any additional relief as the Court determines to be just and proper.

Respectfully submitted,

Dated: October 22, 2026

/s/ Iris Micklavzina

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