

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF COLORADO**

In re: )  
)  
Pamela Sue Klein ) Case No. 18-12929 JGR  
Debtor. ) Chapter 13

**ORDER APPROVING STIPULATED RESOLUTION OF UNITED STATES TRUSTEE'S  
MOTION TO DISGORGE FEES, AWARD DAMAGES, IMPOSE FINES AND  
PENALTIES, AND ENFORCE CONSENT ORDER FOR INJUNCTIVE RELIEF  
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 to Disgorge Fees, Award Damages, Impose Fines and Penalties, and Enforce Consent Order for Injunctive Relief Against Angel Amore Trujillo (the "Stipulated Motion"), and the Court having reviewed the Stipulated Motion, and finding that good cause exists for granting 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; and (c) from acting as a bankruptcy petition preparer as that term is defined by 11 U.S.C. §110(a). (All of the injunctive provisions are collectively referred to herein as the "Injunction.")

IT IS FURTHER ORDERED that the Injunction 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 Injunction includes, but is not limited to, a prohibition on Ms. Trujillo's involvement in the bankruptcy preparation business conducted by her daughter, Brennah Mares.

IT IS FURTHER ORDERED that Ms. Trujillo shall, pursuant to 11 U.S.C. § 110(h)(3) and L.B.R. 2016-4, pay **\$350** to the Chapter 13 Trustee, Douglas B. Kiel, within **seven (7) days** of the entry of this order.<sup>1</sup>

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<sup>1</sup> Unless instructed otherwise by the Chapter 13 Trustee, the payments should be mailed to the following address: Douglas B. Kiel, Standing Chapter 13 Trustee, P.O. Box 2282, Memphis, TN 38101-2282.

IT IS FURTHER ORDERED that Ms. Trujillo shall, pursuant to 11 U.S.C. § 110(l)(1), pay a fine of \$6,150 to the United States Trustee for Region 19. Of that fine amount, Ms. Trujillo must pay **\$150** within **seven (7) days** of the entry of the stipulated order. Provided Ms. Trujillo makes each of the payments required herein, and remains in compliance with the Injunction, the UST shall not seek to enforce or collect the remaining \$6,000 of the fine.

IT IS FURTHER ORDERED that if Ms. Trujillo violates the Injunction, the UST may initiate any collection, enforcement or other action deemed appropriate, to pursue collection of the remaining \$6,000 fine, and may pursue other appropriate remedies, without limitation.

IT IS FURTHER ORDERED that if the UST is required to enforce the Injunction, and prevails in that action, Ms. Trujillo shall be liable to the UST for all costs, including attorney fees, associated with that enforcement action.

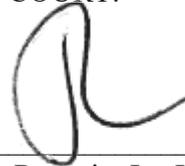
IT IS FURTHER ORDERED that within **fourteen (14) days**, Ms. Trujillo shall provide evidence to the UST that all payments required herein were fully and timely paid.

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

IT IS FURTHER ORDERED that the evidentiary hearing presently schedule to commence on July 17, 2019, at 1:00 p.m., is hereby **VACATED**.

DATED: May 23, 2019

BY THE COURT:



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Joseph G. Rosania, Jr., Judge  
United States Bankruptcy Court