IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF FLORIDA MIAMI DIVISION

Case No. 1:21-cv-20707-JLK

UNITED STATES OF AMERICA,)
Plaintiff,)
v.)
JOHN L. GAY JR.,)
TAMMI KING,)
NORMAN G. WILLIAMS JR.,)
THE TAX DOCTOR LLC,)
KINGSWORLD FINANCIAL SERVICES INC., and)))
BRIGHTSTAR MANAGEMENT CORP.,)
Defendants.) _)

ORDER AND JUDGMENT OF PERMANENT INJUNCTION AND DISGORGEMENT AGAINST TAMMI KING, KINGSWORLD FINANCIAL SERVICES INC., AND BRIGHTSTAR MANAGEMENT CORP.

Before the Court is the Stipulated Motion for Entry of Order and Judgment of Permanent Injunction and Disgorgement against Tammi King, Kingsworld Financial Services Inc., and Brightstar Management Corp. (hereafter, collectively "Tammi King"). Doc. No. 51. The United States and Tammi King have stipulated that no provision in this Order and Judgment of Permanent Injunction and Disgorgement against Tammi King or the fact that Tammi King is agreeing to it constitutes an admission by her of any of the allegations set forth by the United States in the complaint.

Pursuant to the terms of the Stipulated Motion for Entry of Order and Judgment of Permanent Injunction and Disgorgement against Tammi King:

IT IS HEREBY ORDERED that Tammi King, and all those in active concert or participation with her, are, effective from the date of this Order, permanently enjoined pursuant to Internal Revenue Code (26 U.S.C.) §§ 7407, 7408, and 7402(a) from:

- (1) preparing, assisting in the preparation of, or directing the preparation of federal tax returns, amended returns, or other tax-related documents or forms, including any electronically submitted tax returns or tax-related documents, for any entity or person other than herself;
- (2) filing, assisting in the filing of, or directing the filing of federal tax returns, amended returns, or other tax-related documents or forms, including any electronically submitted tax returns or tax-related documents, for any entity or person other than herself;
- owning, operating, managing, working in, investing in, providing capital or loans to, receiving fees or remuneration from, controlling, licensing, consulting with, or franchising a tax return preparation business;
- (4) training, instructing, teaching, and creating or providing cheat sheets, memoranda, directions, instructions, or manuals, pertaining to the preparation of federal tax returns;
- (5) transferring, selling, or assigning her customer lists and/or other customer information;
- (6) selling or receiving income from any franchise agreements related to the preparation of tax returns, amended returns, or other tax-related documents or forms, including any electronically submitted tax returns or tax-related documents;
- (7) maintaining, assigning, holding, using, or obtaining a Preparer Tax Identification Number (PTIN) or an Electronic Filing Identification Number (EFIN);
- (8) engaging in any other activity subject to penalty under 26 U.S.C. §§ 6694, 6695, 6701, or any other penalty provision in the Internal Revenue Code (26 U.S.C.); and
- (9) engaging in any conduct that substantially interferes with the proper administration and enforcement of the internal revenue laws.

IT IS FURTHER ORDERED that Tammi King, pursuant to 26 U.S.C. §§ 7402(a) and 7407, shall immediately and permanently close all tax return preparation stores that she owns directly or through any entity.

IT IS FURTHER ORDERED that Tammi King, pursuant to 26 U.S.C. § 7402(a), is prohibited, either directly or through any entity, from assigning, transferring, or selling any franchise agreement, independent contractor agreement, or employment contract related to any tax return preparation business to which she or any entity under her control is a party.

IT IS FURTHER ORDERED that Tammi King, pursuant to 26 U.S.C. § 7402(a), is barred, directly or through any entity, from: (1) selling to any individual or entity a list of customers, or any other customer information, for whom Tammi King, and any entity or name through which Tammi King, or those acting at her direction, have at any time since January 1, 2013 prepared a tax return; (2) assigning, disseminating, providing, or giving to any current or former franchisee, manager, tax return preparer, employee, or independent contractor of Tammi King, and any entity or name through which Tammi King prepares tax returns or owns or franchises a tax return preparation business, a list of customers or any other customer information for customers for whom Tammi King, and any entity or name through which Tammi King, or those acting at her direction, have at any time since January 1, 2013 prepared a tax return; and (3) selling to any individual or entity any proprietary information pertaining to any business or name through which Tammi King, or those acting at her direction, have at any time since January 1, 2013 prepared a tax return.

IT IS FURTHER ORDERED that Tammi King, pursuant to 26 U.S.C. § 7402(a), provide a copy of this Order to all principals, officers, managers, franchisees, employees, and independent contractors of Tammi King, and any tax preparation business or store that Tammi

King, or any entity under her control, owned, franchised, or managed, within 15 days of this Order, and provide to counsel for the United States within 30 days of this Order a signed and dated acknowledgment of receipt of this Order for each person whom Tammi King provided a copy of this Order.

IT IS FURTHER ORDERED that Judgment shall be entered in favor of the United States and against Tammi King in the amount of \$33,396.99 for the disgorgement of the proceeds that Tammi King received for the preparation of tax returns making or reporting false or fraudulent claims, deductions, credits, income, expenses, or other information resulting in the understatement of taxes. The Clerk of the Court is directed to enter the Judgment in favor of the United States and against Tammi King in the amount of \$33,396.99.

IT IS FURTHER ORDERED that the Court shall retain jurisdiction over Tammi King and over this action to enforce this permanent injunction entered against her.

IT IS FURTHER ORDERED that the United States shall be entitled to conduct discovery to monitor Tammi King's compliance with the terms of the permanent injunction entered against her.

DONE AND ORDERED in Miami, Florida, this 25th day of March, 2022.

JAMES LAWRENCE KING

UNITED STATES DISTRICT/JUDGE

SOUTHERN DISTRICT OF FLORIDA