

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MISSOURI

United States of America,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil No. 4:12-cv- 01023
	)	
Rahman Watson,	)	
	)	
Defendant.	)	

**Stipulation for Final Permanent Injunction and Order**

The United States of America has filed a complaint for a permanent injunction against Rahman Watson, seeking to permanently bar him from preparing federal tax returns for others.

The parties hereby stipulate as follows:

1. Rahman Watson and his attorney, Adam Fein, understand that this Stipulation for Final Permanent Injunction and Order constitutes the final judgment in this matter, and Watson waives any and all right to appeal from this judgment. Rahman Watson also waives the entry of findings of fact and conclusions of law under Fed. R. Civ. P. 52.

2. Rahman Watson consents to the entry of this Stipulation for Final Permanent Injunction and Order under 26 U.S.C. (I.R.C.) §§ 7402(a), 7407 and 7408 without further notice and agrees to be bound by its terms and to waive any right of appeal. Watson also waives his right to be personally served with the Complaint in this matter, as he and his attorney have been provided with a copy of the Complaint. Watson understands and agrees that the Court will retain jurisdiction over this matter for the purpose of implementing and enforcing this injunction.

3. The United States and Rahman Watson agree that no provision in this Stipulation for Final Permanent Injunction and Order or the fact that Watson is agreeing to it constitutes an admission by him of any of the allegations set forth by the United States in the foregoing paragraph or the Complaint.

4. The parties further agree that entry of this Stipulation for Final Permanent Injunction and Order neither precludes the IRS from assessing penalties against Watson for violations of the Internal Revenue Code, nor precludes Watson from contesting any such penalties.

Accordingly, the Court hereby FINDS, ORDERS, and DECREES:

A. The Court has jurisdiction under 28 U.S.C. §§ 1340 and 1345 and I.R.C. § 7402(a).

B. Rahman Watson has voluntarily consented to the entry of this permanent injunction and agrees to be bound by its terms.

C. Pursuant to I.R.C. §§ 7402(a), 7407 and 7408, Watson, individually and doing business as any entity, and any officers, agents, servants, employees, attorneys and all persons in active concert or participation with him, is permanently enjoined from, directly or indirectly:

- (1) Acting as a federal tax return preparer or requesting, assisting in, or directing the preparation or filing of federal tax returns, amended returns, or other related documents or forms for other persons;
- (2) Advising, assisting, counseling, or instructing anyone about the preparation or filing of a federal income tax return;
- (3) Engaging in any other activity subject to penalty under I.R.C. §§ 6694, 6701, or any other penalty provision in the I.R.C.; or
- (4) Otherwise engaging in any conduct that substantially interferes with the proper administration and enforcement of the Internal Revenue laws.

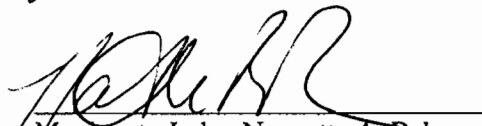
D. Within thirty (30) days of the entry of this Stipulation for Final Permanent Injunction and Order, Rahman Watson is ordered to provide a copy of this Stipulation for Final Permanent Injunction and Order to any of his employees and/or independent contractors. Rahman Watson is further ordered to provide to counsel for the United States, within thirty-five (35) days of the entry of this Stipulation for Final Permanent Injunction and Order, a signed and dated acknowledgment of receipt from each person to whom he has provided such a copy.

E. Within thirty (30) days of the entry of this Stipulation for Final Permanent Injunction and Order, Rahman Watson is ordered to provide to counsel for the United States a signed statement acknowledging that he has received a copy of this signed order and that he understands that the Order permanently prohibits him from preparing, or assisting in the preparation of, federal tax returns for others for the rest of his life.

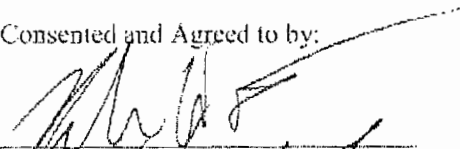
F. The United States is permitted to engage in discovery after the entry of this Stipulation for Final Permanent Injunction and Order to ensure compliance with its terms.

G. This Court shall retain jurisdiction over this action for purposes of implementing and enforcing this Stipulation for Final Permanent Injunction and Order .

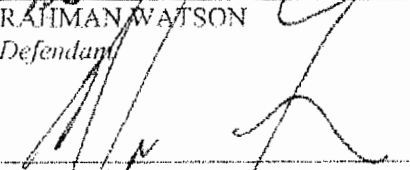
SO ORDERED this 6th day of August, 2012.

  
Magistrate Judge Nannette A. Baker  
UNITED STATES DISTRICT COURT

Consented and Agreed to by:

  
RAHMAN WATSON  
*Defendant*

Dated: 6/7/12

  
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Dated: June 7, 2012

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Dated: June 8, 2012