

IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF FLORIDA 2011 AUG 15 PM 2:06
FORT MYERS DIVISION

U.S. DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
FORT MYERS, FLORIDA

UNITED STATES OF AMERICA)
)
 Plaintiff,)
)
 v.)
)
 PATRICIA ANN RODGERS and)
 CHARLIE FLETCHER CHERY)
)
 Defendant.)

Civil No. 2:11-cv-00221-JES-SPC

**STIPULATED FINAL JUDGMENT OF PERMANENT INJUNCTION
AGAINST CHARLIE FLETCHER CHERY**

Plaintiff, the United States of America, has filed a Complaint for Permanent Injunction in this matter against Defendant Charlie Fletcher Chery.

Defendant admits that this Court has jurisdiction over her and over the subject matter of this action.

Defendant consents to the entry, without further notice, of this Stipulated Final Judgment of Permanent Injunction.

Defendant waives the entry of findings of fact and conclusions of law under Rules 52 and 65 of the Federal Rules of Civil Procedure and 26 U.S.C. §§ 7402 and 7408.

Defendant waives any right she may have to appeal from the Stipulated Final Judgment of Permanent Injunction.

Defendant states that she enters into this Stipulated Final Judgment of Permanent Injunction voluntarily.

Defendant acknowledges that entry of this Stipulated Final Judgment of Permanent Injunction neither precludes the Internal Revenue Service from assessing taxes, interest, or penalties against her for asserted violations of the Internal Revenue Code, nor precludes Defendant from contesting such taxes, interest, or penalties.

Defendant agrees that this Court shall retain jurisdiction over her for the purpose of implementing and enforcing this Stipulated Final Judgment of Permanent Injunction, and understands that if she violates this injunction, she may be found to be in contempt of court and may be sanctioned or imprisoned.

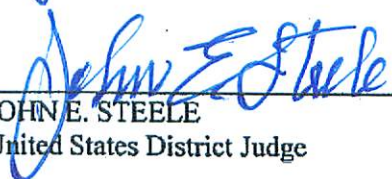
NOW, THEREFORE, it is accordingly, ORDERED, ADJUDGED, AND DECREED that:

1. The Court has jurisdiction over this action under 28 U.S.C. §§ 1340 and 1345 and under 26 U.S.C. §§ 7402 and 7408;
2. Charlie Fletcher Chery and her representatives, agents, servants, employees, and anyone in active concert or participation with her are PERMANENTLY ENJOINED pursuant to 26 U.S.C. §§ 7402(a) and 7408 from directly or indirectly:
 - a. Engaging in activity subject to penalty under 26 U.S.C. § 6701, including preparing, assisting in preparing, procuring, or advising with respect to a return, affidavit, claim, or other document, including Forms W-2, related to a matter material to the internal revenue laws that includes a position that they know would result in an understatement of another person's tax liability, and;

b. Engaging in any conduct subject to any penalty under the Internal Revenue Code or any conduct that interferes with the administration and enforcement of the internal revenue laws.

IT IS FURTHER ORDERED that the Court shall retain jurisdiction over the defendant Charlie Fletcher Chery and over this action to enforce this injunction and that the United States shall be entitled to conduct discovery to monitor Chery's compliance with the terms of this injunction entered against her.


IT IS SO ORDERED this 17th day of August 2011.



JOHN E. STEELE
United States District Judge

Consented to and submitted by:

ROBERT E. O'NEILL
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