## Case 2:12-cv-03324-MAM Document 4 Filed 10/03/12 Page 1 of 3

## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,	)
Plaintiff,	
v.	) No. 2:12-cv-03324-MAM
THOMAS L. GREEN,	)
Defendant	)

## STIPULATED PERMANENT INJUNCTION AGAINST THOMAS L. GREEN

Plaintiff, the United States of America, has filed a complaint for permanent injunction against the defendant, Thomas L. Green. Defendant Thomas L. Green, without admitting or denying any of the allegations in the complaint except admitting that the Court has jurisdiction, waives the entry of findings of fact and conclusions of law under Rule 52 of the Federal Rules of Civil Procedure and consents to the entry of this permanent injunction under 26 U.S.C. §§ 7402(a) and 7407(b). Orcen further waives any right he may have to appeal from this permanent injunction. The parties agree that entry of this permanent injunction neither precludes the Internal Revenue Service from assessing penalties against Green for asserted violations of the Internal Revenue Code nor precludes Green from contesting any such penalties.

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

1. The Court has jurisdiction over this action under 28 U.S.C. Sections 1340 and 1345 and 26 U.S.C. Sections 7402(a) and 7407(b).

2. The Court finds that Green has neither admitted nor denied the United States' allegations that he has engaged in conduct that is subject to penalty under Sections 6694 and 6701 of the Internal Revenue Code, and that interferes with the administration and enforcement

of the internal revenue laws.

3. Green and his representatives, agents, servants, employees, independent contractors, entities he controls, including Green's Tax Services, attorneys, and all persons in active concert or participation with him who receive actual notice of this Order, are enjoined under 26 U.S.C. §§ 7402(a) and 7407(b) from directly or indirectly:

- a. preparing or assisting in the preparation or filing of false or abusive federal tax
  returns or other related documents or forms for others, including but not limited to
  tax returns claiming false and/or inflated deductions;
- engaging in any conduct subject to penalty under 26 U.S.C. §§ 6694 or 6701,
  including but not limited to preparing any part of a return that includes an unrealistic position;
- c. engaging in any conduct that substantially interferes with the administration and enforcement of the internal revenue laws; and
- d. misrepresenting any of the terms of this Order.

4. Green is ordered to mail, at his own expense, a copy of this Stipulated Permanent Injunction Against Thomas L. Green within 14 days of the entry of this Order to all persons and entities for whom he prepared any federal income tax returns, amended returns, refund claim, or other federal tax-related documents since May 13, 2011. Green shall file a certificate of compliance, signed under penalty of perjury, with the Court within 15 days of the entry of this Order.

5. Green is ordered to turn over to the United States a list of names, addresses, phone numbers and Social Security numbers of all individuals or entities for whom Green prepared or

assisted in the preparation of any tax-related documents, including tax returns or claims for refund, on or after May 13, 2011. Green must provide this information to counsel for the United States within 15 days from entry of this Order.

6. The Court retains jurisdiction to enforce this injunction and the United States is permitted to engage in post-judgment discovery to ensure compliance with this permanent injunction.

Agreed to by:

ZANE DAVID MEMEGER United States Attorney

ANN E. NASH Trial Attorney, Tax Division U.S. Department of Justice P.O. Box 227 Washington, DC 20044 Phone: (202) 307-6489 Fax: (202) 514-6866 ann.e.nash@usdoj.gov

2/10/m

THOMAS L. GREEN, pro se 1 2222 N. 29<sup>th</sup> Street Philadelphia, PA 19132 Phonc: (215) 235-5539 Thomgre1@aol.com

Defendant

Counsel for Plaintiff

SO ORDERED this day of October 2012.

dugte Hon. Mary A. McLaughlin

United States District Judge