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8 **IN THE UNITED STATES DISTRICT COURT**
9 **FOR THE DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 CARLOS ROBERTO YERO and
14 TRAVEL ALL THE WORLD A/K/A CA TAX
15 SERVICES,

16 Defendants.
17

Case No. 2:24-cv-00539

**COMPLAINT FOR PERMANENT
INJUNCTION AND OTHER
EQUITABLE RELIEF**

18 The United States of America, by and through its undersigned counsel, complains and
19 alleges as follows:

20 1. This is a civil action brought by the United States under 26 U.S.C. §§ 7402, 7407,
21 and 7408 to enjoin Defendants Carlos Roberto Yero and Travel All The World, and anyone in
22 active concert or participation with them, from:

23 a. acting as a federal tax return preparer or requesting, assisting in, or
24 directing the preparation or filing of federal tax returns, amended returns, or other related
25 documents or forms for others;

26 b. preparing or assisting in preparing or filing federal tax returns, amended
27 returns, or other related documents or forms that Defendants know or reasonably should

1 know will result in an understatement of federal tax liability or the overstatement of tax
 2 refunds as prohibited by 26 U.S.C. § 6694;

3 c. owning, operating, managing, controlling, working for, profiting from, or
 4 volunteering for any business or entity engaged in tax return preparation;

5 d. training, instructing, teaching, and creating or providing cheat sheets,
 6 memoranda, directions, instructions, or manuals, pertaining to the preparation of federal
 7 tax returns;

8 e. using, maintaining, holding, renewing, obtaining, transferring, selling, or
 9 assigning any Preparer Tax Identification Numbers (“PTINs”), Electronic Filing
 10 Identification Numbers (“EFINs”), or any other federally issued identification number in
 11 order to file or remit federal income tax returns for other persons or entities;

12 f. engaging in any activity subject to penalty under 26 U.S.C. §§ 6694, 6695,
 13 6701, or any other penalty provision in the Internal Revenue Code; and

14 g. engaging in any conduct that substantially interferes with the proper
 15 administration and enforcement of the internal revenue laws.

16 JURISDICTION AND VENUE

17 2. This action has been requested by the Chief Counsel of the Internal Revenue
 18 Service, a delegate of the Secretary of the Treasury, and commenced at the direction of a
 19 delegate of the Attorney General, pursuant to the provisions of 26 U.S.C. §§ 7402(a), 7407, and
 20 7408.

21 3. Jurisdiction is conferred on the Court by 28 U.S.C. §§ 1340 and 1345 and 26
 22 U.S.C. §§ 7402(a), 7407, and 7408.

23 4. Venue is proper in this Court under 28 U.S.C. § 1391 and 26 U.S.C. §§ 7407 and
 24 7408 because Defendants reside and operate in this judicial district and a substantial part of the
 25 actions giving rise to this suit took place within this judicial district.

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DEFENDANTS

5. Defendant Yero resides in Las Vegas, Nevada, and he operates his business, Defendant Travel All the World a/k/a CA Tax Services, at 1819 E. Charleston Blvd., Suite 102, Las Vegas, Nevada 89104, which are both within the jurisdiction of this Court.

6. Defendant Yero is a paid federal tax return preparer doing business through a corporation, Defendant Travel All the World.

7. Defendant Yero is 100% shareholder of Defendant Travel All the World.

8. Defendant Travel All the World started its return-preparation business in 2016.

9. Defendant Yero has a high school degree and has completed two years of a three-year technical program in Cuba.

10. Defendant Yero has been preparing federal tax returns since at least 2015.

11. In 2009, Defendant Yero attended a tax-preparation training sponsored by H&R Block.

12. Defendant Travel All the World shares office space with Awesome Tax, which is owned and operated by Michel Moreno.

13. Defendant Yero and Michel Moreno equally split the tax-preparation income produced by these businesses.

14. Defendant Travel All the World is a paid tax return preparer. Several individuals prepare returns on behalf of Defendant Yero and Defendant Travel All the World (the “Defendants’ employees”).

15. Defendant Yero reviews every return before it is filed with the IRS.

16. Each of Defendants’ employees who prepares returns has their own PTIN—a unique identifier assigned by the IRS to tax preparers.

17. From at least 2018 to the present, Defendant Yero individually prepared roughly 250 to 500 returns per year and submitted them using a PTIN ending “6287.”

18. Regardless of if the return is prepared by Defendant Yero or one of the Defendants’ employees, the return is filed using one of Defendants’ EFINs—a unique identifier

assigned by the IRS to businesses that file federal tax returns electronically. Defendant Yero and Defendant Travel All the World use at least two EFINs (ending “6139” and “4212”) to file returns.

19. The chart below shows the total number of known returns the Defendants prepared and filed during processing years 2018 through 2023 (covering tax years ending December 31, 2017 through December 31, 2022) using the two EFINs:

**Number of Returns Filed
EFINs ending “6139” and “4212”**

Processing Year	Returns
2018	1,138
2019	1,190
2020	953
2021	537
2022	1,031
2023 ¹	1,156

Total: 6,005

DEFENDANTS’ ACTIVITIES

20. Since at least 2015, and continuing to the present, Defendants Yero and Travel All The World have been engaged in the preparation of tax returns, acting as paid tax return preparers for individuals (sometimes referred herein as “customers”).

21. Defendant Yero has offered tax return preparation services through Defendant Travel All the World since 2016.

22. Defendant Yero and Defendant Travel All the World have continually and repeatedly engaged in conduct subject to penalty under 26 U.S.C. § 6694 in that they have, among other things:

- a. taken unrealistic and unsustainable positions on customers’ tax returns, resulting in understatements of taxes due;

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¹ The data in this table reflects the returns filed as of October 16, 2023.

1 b. willfully or recklessly understated the tax due and overstated the refund
2 due on customers' tax returns;

3 c. willfully or recklessly included items on customers' tax returns for which
4 they did not obtain sufficient substantiation; and

5 d. recklessly or intentionally disregarded the rules and regulations pertaining
6 to the preparation of tax returns.

7 23. Defendants Yero and Travel All the World have also continually and repeatedly
8 engaged in conduct subject to penalty under 26 U.S.C. § 6695 by failing to comply with
9 regulatory due diligence requirements and by failing to give their customers complete copies of
10 tax returns as required by 26 U.S.C. § 6107(a).

11 24. Defendants have also continually and repeatedly engaged in fraudulent and
12 deceptive conduct which has substantially interfered with the proper administration of the
13 Internal Revenue laws by pocketing overinflated tax refunds as "bank fees" without customers'
14 knowledge.

15 25. To generalize the scheme, Defendants Yero and Travel All the World submit
16 fraudulent returns to the IRS overstating the amount of refund due. Defendants then tell their
17 customers that they will receive a smaller refund than the refund amount reported to the IRS and
18 collect as "bank fees" the substantial difference.

19 26. Defendants' conduct impedes the IRS's efficient examination of their customers'
20 tax returns and hinders the customers from properly responding to examination inquiries.

21 27. The IRS has repeatedly informed Defendant Yero that his conduct is improper
22 and illegal. For example, between December 2013 and February 2019, the IRS sent at least four
23 letters and called Defendant Yero once to warn him about his due diligence requirements since
24 the returns prepared by him were highly questionable.

25 28. These warnings have gone unheeded. Defendants Yero and Travel All the World
26 continue to prepare improper and illegal tax returns for their customers, despite these warnings.

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**SPECIFIC ALLEGATIONS REGARDING DEFENDANTS' CONDUCT:
HOW DEFENDANTS' RETURN-PREPARATION SCHEME WORKED**

29. At all times relevant here, Defendants' typical customers were, and are, middle- and low-income individual wage earners and self-employed individuals.

30. Defendants do not advertise their tax preparation services; they rely instead on repeat customers and new customers sourced through social media.

31. Customers are typically referred to Defendants Yero and Travel All the World by friends, coworkers, and relatives who have had their tax returns prepared by Defendants.

32. Defendants' customers are often from the Cuban community, and many do not speak English.

33. For the tax years 2017 through 2022, between 84–94% of the federal income tax returns submitted using Defendants' EFINs (ending “6139” and “4212”) resulted in a refund.

34. And for the tax years 2017 through 2022, roughly 77–94% of the federal income tax returns submitted using Defendant Yero's PTIN (ending “6287”) resulted in a refund.

35. Defendant Yero and the Defendants' employees generally prepare each tax return after only a single meeting or conference with a customer at Defendants' office.

36. The Defendants accept customers by appointment and walk-in.

37. Typically, when a customer arrives, the customer signs in and completes a questionnaire with questions about filing status and dependents. Defendant Yero or one of Defendants' tax return preparer employees then reviews the questionnaire and asks the customer questions, entering the information into tax-preparation software to complete the customers' return. Some customers, however, did not fill out any questionnaire.

38. After the tax return is prepared by Defendant Yero or one of Defendants' tax return preparer employees, the preparer reviews the return with the client, and, if the client agrees, the client signs the Form 8879 to authorize e-filing. The tax return preparer sometimes did not review the return with their client.

39. The client is not present when the return is e-filed with the IRS.

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1 40. Defendants Yero and Travel All the World usually charge between \$35 and \$200
2 per return.

3 41. Defendants Yero and Travel all the World regularly file returns with the IRS,
4 without their customers' knowledge, which willfully inflate the amount of tax refund due on the
5 customers' tax returns and skimmed as "bank fees" a part of this improper refund before
6 remitting the rest to their customers. Defendants were able to collect this "bank fee" because they
7 often used what is referred to as "Bank Products," which is a type of disbursement option for tax
8 refunds whereby the customers' refund is direct deposited at a financial institution that has an
9 agreement with the tax return preparer to receive and disburse the customers' refund.

10 42. Many customers were unaware that the Defendants collected this "bank fee," and
11 did not sign any forms or waivers authorizing Defendants to use any Bank Products or to collect
12 any fee.

13 43. Specifically, Defendants Yero and Travel All The World:

14 a. prepared and filed tax returns for their customers (without their
15 knowledge) which overstated the amount of refund due from the IRS;

16 b. advised customers that they are receiving a tax refund in an amount less
17 than what is shown on the filed return, even providing customers with copies of tax
18 returns different than the ones filed;

19 c. used Bank Products, often without their customers' assent or knowledge,
20 to route their customers' refund through a bank account where the Defendants could
21 collect certain fees; and

22 d. pocketed as "bank fees" the substantial difference between the amount of
23 refund reported to the IRS and customers.

24 44. The amount collected as "bank fees" ranges anywhere from around \$300 to \$800.

25 45. This "bank fee" was often in addition to the fee directly paid to the Defendants by
26 Defendants' customers to prepare their tax returns.

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1 46. Defendants Yero and Travel All the World often included information on their
2 customers' tax returns which Defendants knew, or reasonably should have known, was false or
3 inaccurate in order to overstate the amount of refund due from the IRS.

4 47. In preparing customers' tax returns, Defendants Yero and Travel All The World
5 failed to exercise due diligence in determining the eligibility of taxpayers to claim Earned
6 Income Credits, Child Tax Credits, and American Opportunity Tax Credits.

7 48. Specifically, Defendants Yero and Travel All the World:

8 a. included Earned Income Credits, Child Tax Credits, and American
9 Opportunity Tax Credits on customers' tax returns for which the Defendants knew, or
10 should have reasonably known, customers were ineligible;

11 b. ignored the implications of information furnished to, or known by, them
12 and failed to make reasonable inquiries into information that a reasonable and well-
13 informed tax return preparer knowledgeable in the law would conclude is incorrect,
14 inconsistent, or incomplete;

15 c. failed to contemporaneously document in their files any inquiries made
16 and the responses to those inquiries; and

17 d. failed to collect and maintain records substantiating the clients' eligibility
18 for, and the Defendants' computation of, Earned Income Credits, Child Tax Credits, and
19 American Opportunity Tax Credits reported on their customers' tax returns.

20 49. Defendants Yero and Travel All The World often failed to furnish a copy of the
21 tax return filed with the IRS to their customers as required by 26 U.S.C. § 6107(a).

22 50. Defendants Yero's and Travel All The World's preparation of tax returns goes
23 beyond neglect and insufficient verification. Tax returns filed by Defendants are riddled with
24 errors and fabrications. Among other things, Defendants:

25 a. filed returns with the wrong filing status and, on customers' returns,
26 claimed as their customers' dependents individuals who were not dependents;

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b. claimed credits on their customers' tax returns for which the customer was ineligible, including claiming Residential Energy Credits and education credits for customers who did not qualify;

c. improperly included nondeductible personal expenses (e.g., home repairs and car registration fees) as "Other taxes" on Schedule A (Itemized Deductions);

d. reported charitable contributions on their customers' tax returns on Schedule A (Itemized Deductions) which were larger than the amount of charitable contributions actually made by their customers; and

e. inflated or fabricated business income and deductions on their customers' tax returns on Schedule C (Profit or Loss from Business).

51. By preparing their customers' returns in this way, Defendants Yero and Travel All The World fraudulently claim tax credits and claim bogus deductions to fraudulently reduce their customers' tax liability, which often results in an improper refund being issued to these customers by the IRS.

52. When preparing returns, Defendants Yero and Travel All The World also alter tax return information provided by customers without those customers' knowledge or consent.

53. Some of Defendants Yero and Travel All The World's customers have noticed this misconduct and have filed formal complaints with the IRS. In their complaints, customers have noted that the tax return provided to them by Defendants Yero and Travel All The World showed a refund different, and substantially less, than the refund reported to the IRS by the Defendants.

SPECIFIC CUSTOMERS' EXPERIENCES

54. One Customer ("Customer 1") used Defendants Yero and Travel All The World to prepare her 2019 tax return. Customer 1 said Defendant Yero prepared her 2019 return, even though a different tax return preparer signed it. Customer 1 did not complete a questionnaire for Defendant Yero to prepare her tax return. Customer 1's 2019 tax return prepared by Defendant Yero is filled with errors and fraudulent entries that resulted in an improper understatement of

Customer 1's tax liabilities which, based on the amount of refund issued to Customer 1 and requested on the return, was largely pocketed by Defendants Yero and Travel All The World as "bank fees."

a. **Claiming Improper Dependents and Child Tax Credits.** On Customer 1's 2019 tax return, Defendants Yero and Travel All The World included Customer 1's niece and nephew as dependents even though they lived with their mother, not Customer 1. Defendants Yero and Travel All The World did not ask any questions about the niece and nephew's living arrangements or how much support Customer 1 provided for them. Nevertheless, Defendants Yero and Travel All The World claimed the Earned Income Credit and Child Tax Credit for the niece and nephew. In the Form 8867 (Paid Preparer's Due Diligence Checklist) filed with Customer 1's 2019 tax return, Defendants claimed they collected and kept a copy of school records of Customer 1's dependents, but Customer 1 indicated that she never provided this information to the Defendants.

b. **Fabricated Schedule C (Profit or Loss From Business).** Defendants Yero and Travel All The World included a Schedule C (Profit or Loss from Business) with Customer 1's 2019 tax return even though Customer 1 never owned her own business; she worked as an employee for other companies. Customer 1 never provided information to the Defendants about business income or expenses and did not discuss having any such business income or expenses with the Defendants. Defendants fabricated a Schedule C with expenses far exceeding the gross income so that a substantial net loss understated Customer 1's tax liability and overstated the amount of refund due.

c. **Improper "Bank Fees".** When interviewed by the IRS, Customer 1 indicated that she did not pay Defendants Yero or Travel All The World up front for the preparation of her tax return. Instead, the preparation fee was taken from her refund, but she did not know how much, and she did not have any documentation of, and did not sign anything related to, the fee. Defendants Yero and Travel All The World e-filed Customer 1's 2019 tax return requesting a refund of around \$7,500 with the IRS and asking it to be

1 directly deposited into a bank account at a financial institution, but Customer 1 stated the
2 refund she actually received was less than \$7,000. Defendants Yero and Travel All The
3 World likely pocketed the nearly \$600 difference between these two amounts as “bank
4 fees.”

5 55. Another customer (“Customer 2”) used Defendants Yero and Travel All The
6 World to prepare her 2019 tax return. Defendants Yero and Travel All The World filed the return
7 with one of their EFINs, but the return was signed by a different tax return preparer employee of
8 Defendant Travel All the World. Customer 2 brought her Form W-2, student loan information,
9 and mortgage documents to the Defendants’ office to have her return prepared. Customer 2 paid
10 around \$60 for the return. Customer 2’s tax return filed by Defendants Yero and Travel All The
11 World are riddled with errors and fabrications.

12 a. **False Energy Credit.** A roughly \$1,500 residential energy credit was
13 claimed on Customer 2’s 2019 tax return. But Customer 2 did not have any renewable
14 energy equipment installed—such as solar panels—and did not discuss renewable energy
15 equipment or credits with the tax return preparer.

16 b. **Bogus Itemized Deductions.** Defendants Yero and Travel All The World
17 filed Customer 2’s 2019 tax return with improper deductions included on Schedule A
18 (Itemized Deductions). Specifically, in the “Other taxes” section of Schedule A, there is
19 reported “Other taxes” in the amount of over \$6,000 but all the amounts listed making up
20 this amount are not proper deductions. The “Other taxes” amount is made up of car
21 insurance and registration expenses, homeowner association fees, and home repair
22 expenses. These are not proper deductions. *See* 26 U.S.C. § 262(a). Additionally, on the
23 Schedule A there is reported over \$7,000 in charitable gifts made. But Customer 2 did not
24 remember discussing charitable gifts with the tax return preparer and was not sure how
25 much she donated that year.

26 56. Defendants Yero and Travel All The World’s misconduct has continued to the
27 present. A married couple (“Customer 3”) went to Defendants Yero and Travel All The World to

1 have their 2022 tax return prepared. This return indicates that the Defendants continue to use the
 2 same abusive schemes to improperly understate their customers' tax liabilities.

3 a. **Bogus Itemized Deductions.** Customer 3's 2022 tax return includes a
 4 Schedule A (Itemized Deductions) with improper personal expenses taken as deductions
 5 on the "Other taxes" line. Specifically, here the Schedule A reports over \$6,000 in "Other
 6 taxes," over \$4,000 of which is just listed as "REPAIRS." This is improper. The
 7 remainder of the "Other taxes" is just listed as "OTHERS TAXES" with no indication of
 8 what that refers to.

9 **HARM TO THE UNITED STATES OF AMERICA**

10 57. **Direct Financial Harm.** Defendants Yero and Travel All The World's conduct
 11 harms taxpayers and the United States because their customers are underreporting and
 12 underpaying their tax liabilities. The IRS conducted an analysis of the returns filed by
 13 Defendants Yero and Travel All The World for just the 2019 tax year and estimated that the lost
 14 tax revenues for that year alone was over \$2.5 million.

15 a. To make this estimate, the IRS interviewed 37 customers and reviewed
 16 their tax returns. Roughly 94.6% (35 of 37 customers reviewed) of the returns examined
 17 had errors and fabrications, resulting in an average tax deficiency of \$2,933. The IRS
 18 then applied this 94.6% error rate to the 953 returns filed using one of Defendants' EFINs
 19 (ending "6139" and "4212") to estimate that 901 returns were incorrect. Multiplying the
 20 average tax deficiency by the 901 returns, the IRS estimated that the harm to the United
 21 States for 2019 alone was \$2,642,633.

22 b. Defendants Yero and Travel All The World have continued to prepare and
 23 file tax returns exhibiting the same pattern of misconduct. Defendants prepared and filed
 24 roughly 1,100 tax returns for customers for the 2021 and 2022 tax years. The percentage
 25 of these returns requesting a refund and claiming Earned Income Tax Credits is
 26 substantially similar to the percentages for 2017–2020. The United States will continue to
 27

suffer direct financial harm unless and until Defendants Yero and Travel All The World stop preparing tax returns for customers.

58. **Undermining Public Confidence and Tax Compliance.** In addition to the direct financial harm due to underpaid tax liability and issuance of erroneous refunds, Defendants Yero and Travel All The World's activities undermine public confidence in the administration of the federal tax system and encourage noncompliance with the Internal Revenue laws.

59. **Strain on Limited Resources.** Defendants Yero and Travel All The World's conduct further harms the United States because the government must devote its limited resources to investigating Defendants, identifying their customers, ascertaining their customers' correct tax liabilities, recovering any funds erroneously issued, and collecting additional taxes and penalties. This strain is further compounded by the fact that Defendants Yero and Travel All The World often file tax returns with the IRS that are different than those discussed with, or provided to, their customers.

HARM TO DEFENDANTS' CUSTOMERS AND OTHER RETURN PREPARERS

60. Defendants Yero and Travel All The World's customers have been harmed because they paid the Defendants to prepare proper tax returns. Instead, Defendants Yero and Travel All The World repeatedly prepare improper returns that understate their customers' tax liabilities and wrongly inflate refunds. As a result of Defendants' improper actions, their customers may have to file amended returns, undergo audits by the IRS, or pay unanticipated tax deficiencies.

61. Defendants Yero and Travel All The World's conduct also harms legitimate tax return preparers in Nevada because they lose potential clients to Defendants.

COUNT 1: INJUNCTION UNDER 26 U.S.C. § 7407

62. The United States incorporates by reference the allegations contained in paragraphs 1 through 61 as if set forth here.

63. Section 7407 of Title 26 authorizes a district court to enjoin an individual upon a finding that (1) the individual is a tax return preparer, (2) the preparer's conduct is proscribed in

1 the statute, and (3) injunctive relief is appropriate to prevent the recurrence of the proscribed
2 conduct. The proscribed conduct relevant here may fall into either of these two buckets: that the
3 preparer has “engaged in any conduct subject to penalty under [26 U.S.C. §§ 6694 or 6695],” or
4 that the preparer has engaged in any “fraudulent or deceptive conduct which substantially
5 interferes with the proper administration of the Internal Revenue laws.” 26 U.S.C.
6 § 7407(b)(1)(A), (D).

7 64. A return preparer is subject to penalty under section 6694 when he or she prepares
8 a return that contains an understatement of tax liability or overstatement of a refund that is due
9 to: (a) an unreasonable position that the return preparer knew or should have known was not
10 supported by substantial authority, or (b) a willful attempt to understate the liability for tax on
11 the return, or a reckless or intentional disregard of rules or regulations.

12 65. Section 6695 outlines a long list of conduct that subjects return preparers to
13 penalty. Three provisions are relevant here. First, section 6695(a) imposes a penalty upon a
14 return preparer who fails to furnish a completed copy of a tax return to their customer, as
15 required by 26 U.S.C. § 6107(a). Second, section 6695(c) imposes a penalty upon a return
16 preparer who fails to include their PTIN or identifying number on any return they prepared, as
17 required by 26 U.S.C. § 6109(a)(4). Third, section 6695(g) imposes a penalty upon a return
18 preparer who fails to comply with due diligence requirements in determining customers’
19 eligibility to file as head of household and to claim education and earned income credits.

20 66. Under section 7407, a district court may permanently enjoin an individual from
21 working or acting as a federal tax preparer if it finds: (1) that the individual has continually or
22 repeatedly engaged in the statutorily proscribed conduct; and (2) that a narrower injunction (i.e.,
23 prohibiting only the proscribed conduct) would not be sufficient to prevent the individual’s
24 interference with the proper administration of the Internal Revenue laws.

25 67. Defendant Yero is a “tax return preparer” within the meaning of 26 U.S.C. §
26 7701(a)(36) because he has been compensated for preparing federal income tax returns.

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68. Defendant Travel All The World is a “tax return preparer” within the meaning of 26 U.S.C. § 7701(a)(36) because it employs one or more persons to prepare for compensation federal income tax returns.

69. Defendants Yero and Travel All The World have continually and repeatedly engaged in conduct subject to penalty under 26 U.S.C. § 6694.

70. Defendants Yero and Travel All The World have taken positions on their customers’ tax returns that they knew (or should have known) were unreasonable; willfully attempted to understate their customers’ tax liabilities; and recklessly or intentionally disregarded federal rules, laws, and regulations when preparing returns on behalf of their customers, resulting in an understatement of federal tax liabilities for thousands of customers.

71. Examples of Defendants Yero and Travel All The World’s unreasonable conduct subject to penalty under section 6694 include, but is not limited to, fabricating or taking improper itemized deductions, generating false or fraudulent business schedules, and fraudulently claiming tax credits.

72. Defendants Yero and Travel All The World’s continual and repeated violations of section 6694 fall within the proscribed conduct under 26 U.S.C. § 7407(b)(1)(A) and (D), and thus these Defendants are subject to an injunction under section 7407.

73. Defendants Yero and Travel All The World have also continually and repeatedly engaged in conduct subject to penalty under 26 U.S.C. § 6695. Specifically, Defendants have failed to furnish to their customers completed copies of returns they prepared as required by 26 U.S.C. § 6107(a), *see* 26 U.S.C. § 6695(a), and have continuously failed to act with due diligence in determining their customers’ eligibility for filing as head of household and claiming certain credits, *see* 26 U.S.C. § 6695(g). Defendant Yero has also continually and repeatedly engaged in conduct subject to penalty under 26 U.S.C. § 6695(c) by failing to include his PTIN, or other such identifying number, on returns that he prepared as required by 26 U.S.C. § 6109(a)(4).

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74. Defendants Yero and Travel All The World's continual and repeated violations of section 6695 fall within the proscribed conduct under 26 U.S.C. § 7407(b)(1)(A) and (D), and thus are subject to an injunction under section 7407.

75. If Defendants Yero and Travel All The World are not enjoined, they are likely to continue to prepare and file false and fraudulent tax returns. This will result in the United States receiving deficient revenue and having to commit finite and unrecoverable resources to the examination and investigation of Defendants and their customers. If Defendants are not enjoined, their customers will also continue to be subject to unexpected tax liabilities and IRS audits and examinations.

76. Defendants Yero and Travel All The World's continual and repeated conduct subject to an injunction under 26 U.S.C. § 7407 demonstrates that a narrow injunction prohibiting only specific conduct would be insufficient to prevent their interference with the proper administration of the Internal Revenue laws. The IRS has attempted to curb the Defendants' illegal conduct through written warnings and other outreach efforts. But these efforts have not stopped Defendants from continually and repeatedly violating the Internal Revenue laws. Defendants Yero and Travel All The World should be permanently enjoined from acting as federal tax return preparers.

COUNT 2: INJUNCTION UNDER 26 U.S.C. § 7408

77. The United States incorporates by reference the allegations contained in paragraphs 1 through 76 as if set forth here.

78. Section 7408 of Title 26 authorizes a district court to enjoin any person from, among other things, further engaging in conduct subject to penalty under 26 U.S.C. § 6701.

79. Under 26 U.S.C. § 6701(a), a person is subject to penalty who aids or assists in, procures, or advises with respect to, the preparation of a tax return he knows (or has reason to believe) will result in an understatement of the liability for tax of another person. A person can be subject to penalty under this provision even if the taxpayer for whom the person prepared the return was unaware of the understatement of tax liability. *See* 26 U.S.C. § 6701(d).

1 80. Defendants Yero and Travel All The World have continually and repeated
2 engaged in conduct subject to penalty under 26 U.S.C. § 6701(a). The Defendants have aided or
3 assisted in the preparation of hundreds, if not thousands, of tax returns which they knew (or had
4 reason to believe) would be used in connection with a material matter arising under the internal
5 revenue laws, and they knew that the tax returns would result in an understatement of the tax
6 liability of another person.

7 81. Specifically, Defendants knew (or should have known) the tax returns they
8 prepared were filed with the IRS to comply with federal tax laws mandating the filing of tax
9 returns. Defendants also knew that by fabricating or taking improper itemized deductions,
10 generating false or fraudulent business schedules, and fraudulently claiming tax credits on their
11 customers' returns, the returns would result in the understatement of tax liability for those
12 customers. Accordingly, Defendants' continually and repeatedly engaged in conduct subject to
13 penalty under 26 U.S.C. § 6701.

14 82. Defendants Yero and Travel All The World's continual and repeated violations of
15 26 U.S.C. § 6701 fall within the proscribed conduct of 26 U.S.C. § 7408, and thus the
16 Defendants are subject to an injunction under 26 U.S.C. § 7408.

17 83. Defendants Yero and Travel All The World's continual and repeated conduct
18 subject to an injunction under 26 U.S.C. § 7408 demonstrates that a narrow injunction
19 prohibiting only specific conduct would be insufficient to prevent their interference with the
20 proper administration of the Internal Revenue laws. The IRS has attempted to curb the
21 Defendants' illegal conduct through written warnings and other outreach efforts. But these
22 efforts have not stopped Defendants from continually and repeatedly violating the Internal
23 Revenue laws. Defendants Yero and Travel All The World should be permanently enjoined from
24 acting as federal tax return preparers.

25 **COUNT 3: INJUNCTION UNDER 26 U.S.C. § 7402(a)**

26 84. The United States incorporates by reference the allegations contained in
27 paragraphs 1 through 83 as if set forth here.

1 85. Section 7402 of Title 26 authorizes a district court to issue orders of injunction
2 that are necessary or appropriate for the enforcement of the Internal Revenue laws.

3 86. Defendants, through the actions described above, have engaged in conduct that
4 substantially interferes with the enforcement of the Internal Revenue laws by engaging in
5 fraudulent and deceptive conduct and engaging in conduct subject to penalty under 26 U.S.C. §§
6 6694, 6695, and 6701.

7 87. Unless enjoined from preparing tax returns for customers, Defendants Yero and
8 Travel All The World are likely to continue to engage in such improper conduct and continue to
9 interfere with the enforcement of the Internal Revenue laws. The IRS has tried less drastic
10 remedies to get Defendants to conform their conduct—like issuing them several letters alerting
11 them to their potential noncompliance with due diligence requirements—but Defendants have
12 continued to engage in improper conduct.

13 88. Defendants Yero and Travel All The World's negligent and reckless disregard of
14 the Internal Revenue laws has caused, and will continue to cause (unless enjoined), the United
15 States to suffer irreparable injury by wrongfully providing federal income tax refunds to
16 individuals not entitled to receive them, much of which will never be discovered and recovered.
17 Unless enjoined, the United States will further suffer irreparable harm from devoting substantial,
18 unrecoverable resources and time to auditing the Defendants' customers. There is no adequate
19 remedy at law to compensate the United States for its irreparable injury.

20 89. While the United States will suffer irreparable injury if Defendants Yero and
21 Travel All The World are not enjoined, the Defendants will not be harmed by being compelled to
22 obey the law.

23 90. Enjoining Defendants Yero and Travel All The World is also in the public interest
24 because an injunction, backed by the Court's contempt powers (if needed), will stop the
25 Defendants from preparing fraudulent, illegal returns for customers, which injures the American
26 taxpayers as well as the Defendants' individual customers. Such an injunction will prevent future
27 customers from having to go through IRS audits, having to pay unanticipated tax liabilities, and

1 being subject to civil penalties. And such an injunction will ensure that the United States is
 2 receiving proper revenue to provide essential services to the American public.

3 91. Defendants Yero and Travel All The World should be permanently enjoined from
 4 acting as tax return preparers under the Court's broad injunctive power granted by 26 U.S.C. §
 5 7402(a).

6 **REQUESTS FOR RELIEF**

7 WHEREFORE, the United States respectfully requests that the Court grant the following
 8 relief:

9 A. That the Court find that Defendants Carlos Roberto Yero and Travel All The
 10 World are tax return preparers that have continually and repeatedly engaged in conduct subject to
 11 penalty under 26 U.S.C. § 6694, and that injunctive relief is appropriate under 26 U.S.C. § 7407
 12 to bar them from acting as a federal tax return preparer and from engaging in conduct subject to
 13 penalty under 26 U.S.C. § 6694;

14 B. That the Court find that Defendants Carlos Roberto Yero and Travel All The
 15 World are tax return preparers that have continually and repeatedly engaged in conduct subject to
 16 penalty under 26 U.S.C. § 6695, and that injunctive relief is appropriate under 26 U.S.C. § 7407
 17 to bar them from acting as a federal tax return preparer and from engaging in conduct subject to
 18 penalty under 26 U.S.C. § 6695;

19 C. That the Court find that Defendants Carlos Roberto Yero and Travel All The
 20 World have continually and repeatedly engaged in conduct that substantially interferes with the
 21 proper administration of the Internal Revenue laws, and that injunctive relief is appropriate under
 22 26 U.S.C. § 7407 to bar them from acting as federal tax return preparers and from further
 23 engaging in such conduct;

24 D. That the Court find that Defendants Carlos Roberto Yero and Travel All The
 25 World have continually and repeatedly engaged in conduct subject to penalty under 26 U.S.C.
 26 § 6701, and that injunctive relief is appropriate under 26 U.S.C. § 7408 to bar them from further
 27 engaging in conduct subject to penalty under 26 U.S.C. § 6701;

1 E. That the Court find that Defendants Carlos Roberto Yero and Travel All The
2 World have engaged in conduct that substantially interferes with the enforcement of the Internal
3 Revenue laws, and that permanent injunctive relief barring Defendants Carlos Roberto Yero and
4 Travel All The World from acting as federal tax return preparers is appropriate to prevent the
5 recurrence of that conduct pursuant to 26 U.S.C. § 7402(a);

6 F. That the Court, pursuant to 26 U.S.C. §§ 7402(a), 7407, and 7408, enter a
7 permanent injunction prohibiting Defendants Carlos Roberto Yero and Travel All The World,
8 and anyone acting in concert or participation with them from directly or indirectly:

9 1. Acting as a federal tax return preparer, or preparing, directing the
10 preparation of, or assisting in the preparation of federal tax returns, amended tax returns,
11 or other related documents and forms for any other person or entity other than
12 themselves;

13 2. Aiding or assisting in preparing federal tax returns, amended tax returns,
14 or other related documents and forms that Defendants Carlos Roberto Yero and Travel
15 All The World know or reasonably should know will result in the understatement of any
16 tax liability or the overstatement of a federal tax refund;

17 3. Owning, managing, controlling, working for, profiting from, or
18 volunteering for any business or entity engaged in tax return preparation;

19 4. Using an EFIN, EIN, PTIN, SSN, TIN, or any other federally issued
20 identification number that belongs to another person in order to file or remit federal tax
21 returns for other persons or entities;

22 5. Using, maintaining, renewing, obtaining, transferring, selling, or assigning
23 any PTIN(s) or EFIN(s);

24 6. Engaging in any activity subject to penalty under 26 U.S.C. §§ 6694,
25 6695, 6701 or any other penalty provision in the Internal Revenue Code; and

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1 7. Engaging in conduct that substantially interferes with the proper
2 administration and enforcement of the Internal Revenue laws and from promoting any
3 false tax scheme.

4 G. That the Court, pursuant to 26 U.S.C. §§ 7402(a), 7407, and 7408, enter an
5 injunction requiring Defendants Carlos Roberto Yero and Travel All The World, at their own
6 expense and within thirty (30) days of entry of the injunction, to do the following actions:

- 7 1. Contact by certified mail, and, if an e-mail address is known, by e-mail,
8 each person or entity for whom Defendants Carlos Roberto Yero and
9 Travel All The World have prepared federal income tax returns since
10 January 1, 2017, to inform them of the permanent injunction entered
11 against the Defendants, including sending a copy of the order of injunction
12 but not enclosing any other documents or enclosures unless agreed to by
13 counsel for the United States or approved by the Court;
- 14 2. Turn over to the United States a list that identifies by name, social security
15 number, address, e-mail address, telephone number, and tax period(s) all
16 persons or entities for whom Defendants Carlos Roberto Yero and Travel
17 All The World have prepared federal tax returns or claims for refund since
18 January 1, 2017;
- 19 3. Provide a copy of the Court's order to all of the principals, officers,
20 managers, employees, and independent contractors of their tax return
21 preparation business and provide to counsel for the United States a signed
22 and dated acknowledgement or receipt of the Court's order for each
23 person to whom they provided a copy of the Court's order;
- 24 4. Prominently post a copy of the court's injunction at their place of
25 business; and

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1 5. File a sworn statement with the Court evincing their compliance with the
2 directives outlined in paragraphs G.1–4, above, within forty-five (45) days
3 of entry of the final injunction in this action.

4 H. That the Court enter an order allowing the United States to monitor Defendants
5 Carlos Roberto Yero and Travel All The World’s compliance with the Court’s injunction,
6 including allowing the United States to engage in post-judgment discovery in accordance with
7 the Federal Rules of Civil Procedure;

8 I. That the Court retain jurisdiction over Defendants Carlos Roberto Yero and
9 Travel All The World and over this action to enforce any permanent injunction entered against
10 them; and

11 J. That the Court grant the United States its costs and attorney’s fees, and any
12 further relief as the Court deems appropriate.

13 Dated: March 20, 2024.

14 Respectfully submitted,

15 DAVID A. HUBBERT
16 Deputy Assistant Attorney General

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