

injunction will constitute the final judgment against him and Medici in this civil injunction action, and waives the right to appeal from that judgment.

The United States and Mauricio Consalter agree that entry of the permanent injunction in this case will resolve only this civil injunction action, and will neither preclude the government from pursuing any other current or future civil or criminal matters or proceedings, nor preclude Mauricio Consalter from contesting his liability or guilt in any other matter or proceeding.

Mauricio Consalter further understands and agrees that the Court will retain jurisdiction over this matter for the purpose of implementing and enforcing the injunction and understands that if he violates the injunction, he may be subject to civil and criminal sanctions for contempt of court.

The United States and Mauricio Consalter agree to the entry of a judgment of permanent injunction, as follows:

A. Mauricio Consalter, Medici Health Care Providers SC, and any other business Mauricio Consalter operates or may come to operate, is required to deposit in an appropriate federal depository bank, in accord with federal deposit regulations, withheld employee income tax, withheld employee FICA tax, and employer FICA tax, all as required by the Internal Revenue Code;

B. Mauricio Consalter is required to sign and deliver affidavits to a revenue officer, or to some other person or location designated by the IRS, on the first day of each month, verifying that the requisite deposits of withheld income tax, withheld FICA tax, and employer FICA tax have been made in a timely manner;

C. Mauricio Consalter, Medici Health Care Providers SC, and any other business Mauricio Consalter operates or may come to operate, is required to timely file all employment

(Form 941) and unemployment (Form 940) tax returns coming due after the date of the injunction;

D. Mauricio Consalter, Medici Health Care Providers SC, and any other business Mauricio Consalter operates or may come to operate, is required to timely pay all required outstanding liabilities due on each return required to be filed herein;

E. Mauricio Consalter, for the next five years, is required to notify a revenue officer, or some other person or location designated by the IRS, if he intends, within that five-year period, to form, incorporate, own or work in a managerial capacity for another or a successor business entity;

F. Mauricio Consalter, Medici Health Care Providers SC, and any other business Mauricio Consalter operates or may come to operate, is prohibited from assigning and/or transferring money or property to any other entity to have that entity pay the salaries or wages of his employees;

G. Mauricio Consalter, Medici Health Care Providers SC, and any other business Mauricio Consalter operates or may come to operate, is prohibited from assigning and/or transferring property or making any payments after the injunction is issued until deposits set forth in paragraph (A) are made and until the employment tax and withholding liabilities due under paragraph (D) after the date of the injunction are first paid to the Internal Revenue Service; and

H. The Court shall retain jurisdiction to enforce the Court's Order of Permanent Injunction, and the United States is permitted to engage in post-judgment discovery in accordance with the Federal Rules of Civil Procedure to ensure compliance with the Court's Order of Permanent Injunction.

Agreed to on May 6, 2016, by:



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