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IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	Case No. 1:15cv3603
Plaintiff,	)	
	)	Hon. Charles R. Norgle, Sr.
v.	)	
	)	Mag. Judge Jeffrey Cole
SAMLAND HEALTH CARE INC.,	)	
FLORA SAMPANG, and	)	
ALFREDO SAMPANG,	)	
	)	
Defendants.	)	

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STIPULATED AGREEMENT FOR PERMANENT INJUNCTION  
AGAINST FLORA SAMPANG and ALFREDO SAMPANG

The United States has filed a complaint in which it seeks a permanent injunction under 26 U.S.C. § 7402 against the defendants Samland Health Care Inc., Flora Sampang, and Alfredo Sampang. The United States alleges, in part, that Samland Health Care Inc., as well as Samland Institute of Allied Health and Technology and LS Billing and Office Service, Inc., under the operation of Flora Sampang and Alfredo Sampang, has continually and repeatedly failed to comply with its employment tax obligations.

Flora Sampang and Alfredo Sampang admit that the Court has jurisdiction over them. Flora Sampang and Alfredo Sampang waive the entry of findings of facts and conclusions of law under Rules 52 and 65 of the Federal Rules of Civil Procedure, consents to the entry of judgment of permanent injunction, and agrees to be bound by its terms. Flora Sampang and Alfredo Sampang understand that the permanent injunction will constitute the final judgment against them in this civil injunction action, and waives the right to appeal from that judgment. Flora Sampang and Alfredo Sampang further understand and agree that the Court will retain

jurisdiction over this matter for the purposes of implementing and enforcing this injunction and understands that if they violates the injunction, they may be subject to civil and criminal sanctions for contempt of court.

NOW, THEREFORE, it is ORDERED, ADJUDGED, and DECREED that:

A. For any corporation in which Flora Sampang and Alfredo Sampang have an ownership interest or work in a managerial capacity, they must:

1. 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, for any corporation ;
2. sign and deliver affidavits to Revenue Officer Alfred Gentry 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;
3. timely file all employment (Form 941) and unemployment (Form 940) tax returns coming due after the date of the injunction; and
4. timely pay all required outstanding liabilities due on each return required to be filed herein;

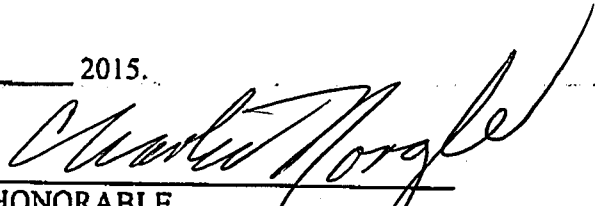
B. Flora Sampang and Alfredo Sampang, for the next five years, must notify a revenue officer, or some other person or location designated by the IRS, if defendant intends, within that five-year period, to form, incorporate, own or work in a managerial capacity for another or a successor business entity;

C. For any corporation in which Flora Sampang and Alfredo Sampang have an ownership interest or work in a managerial capacity, they are enjoined from:


1. assigning and/or transferring money or property to any other entity to have that entity pay the salaries or wages of his employees; and
2. assigning and/or transferring property or making any payments after the injunction is issued until deposits due as set forth in paragraph A.1 are made and until the employment tax and withholding liabilities due under paragraph A.2 after the date of the injunction are first paid to the Internal Revenue Service.

IT IS SO ORDERED, this \_\_\_\_\_ day of \_\_\_\_\_ 2015.

Dated: 10/28/2015

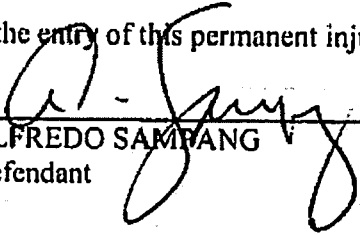
  
HONORABLE  
UNITED STATES DISTRICT JUDGE  
CHARLES R. NORGLÉ

Prepared and submitted by:

  
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The undersigned has reviewed and hereby consents to the entry of this permanent injunction.

  
FLORA SAMPANG  
Defendant

  
ALFREDO SAMPANG  
Defendant