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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 4:25-cv-988
	)	
AMBERLEY RITTER; WESLEY FRANKLIN;	)	
MARK BURKART; KENNETH GARNER; and	)	
DFW INTEGRITY TAXPROS SERVICES, LLC	)	
(d/b/a INTEGRITY TAX PROS),	)	
	)	
Defendants.	)	
_____	)	

COMPLAINT

The United States of America, for its Complaint against the Defendants Amberley Ritter, Wesley Franklin, Mark Burkart, Kenneth Garner, and DFW Integrity Taxpros Services, LLC (d/b/a Integrity Tax Pros) (the “Defendants”), alleges as follows:

1. This is a civil action brought by the United States under 26 U.S.C. §§ 7402(a), 7407, and 7408 to permanently enjoin Amberley Ritter, Wesley Franklin, Mark Burkart, Kenneth Garner, and DFW Integrity Taxpros Services, LLC, and anyone in active concert or participation with them, from:

- a. acting as federal tax return preparers or requesting, assisting in, or directing the preparation or filing of any federal tax returns, amended returns, or other related documents or forms for any person or entity other than themselves;
- b. preparing or assisting in preparing federal tax returns that they know or reasonably should know would result in an understatement of tax liability or the overstatement of federal tax refund(s) as penalized by 26 U.S.C. § 6694;
- c. owning, operating, managing, working for, investing in, volunteering for, consulting for, providing capital or loans to, receiving fees or

remuneration from, controlling, licensing, consulting with, or franchising a tax return preparation business;

- d. training, instructing, teaching, and creating or providing cheat sheets, memoranda, directions, instructions, or manuals pertaining to the preparation of federal tax returns;
- e. maintaining, assigning, holding, using, or obtaining a Preparer Tax Identification Number (“PTIN”) or an Electronic Filing Identification Number (“EFIN”);
- f. advising, counseling, or instructing anyone for compensation or otherwise regarding substantive tax law on the preparation of federal tax returns;
- g. referring any taxpayer to a tax preparation firm or to a tax return preparer, or otherwise suggesting that a taxpayer use any given tax preparation firm or any tax return preparer;
- h. collecting or gathering Forms W-2 and Forms 1099 from individuals or entities who want to have a federal tax return prepared, or referring any person or entity to a tax preparation firm or to a tax return preparer or otherwise suggesting that a taxpayer engage any given tax preparation firm or tax return preparer;
- i. providing office space, equipment, or services for, or in any other way facilitating, the work of any person or entity that is in the business of preparing or filing federal tax returns or other federal tax documents or forms for others or representing persons before the Internal Revenue Service;
- j. engaging in any other activity subject to penalty under 26 U.S.C. §§ 6694, 6695, 6701, or any other penalty provision in the Internal Revenue Code; and
- k. engaging in any conduct that substantially interferes with the proper administration and enforcement of the internal revenue laws.

This action also seeks, under 26 U.S.C. § 7402, an order requiring Amberley Ritter, Wesley Franklin, Mark Burkart, Kenneth Garner, and DFW Integrity Taxpros Services, LLC to disgorge to the United States the gross receipts they received (in the form of tax preparation fees taken

directly from refunds issued by the Treasury) for the preparation of federal tax returns making false and/or fraudulent claims.

Jurisdiction and Venue

2. This action is authorized and requested by the Chief Counsel of the Internal Revenue Service, a delegate of the Secretary of the Treasury of the United States, pursuant to 26 U.S.C. §§ 7402, 7407, and 7408, and is commenced at the direction of a delegate of the Attorney General of the United States.

3. Jurisdiction exists under 28 U.S.C. §§ 1331, 1340, and 1345, and 26 U.S.C. (“Internal Revenue Code”) §§ 7402, 7407, and 7408.

4. Venue is proper in this Court pursuant to 26 U.S.C. §§ 7407(a) and 7408(a), and 28 U.S.C. § 1391(b), because Ritter, Franklin, Burkart, and Garner reside within the jurisdiction of this Court, and a substantial part of the events giving rise to the United States’ claims occurred in this district.

Parties

5. Plaintiff is the United States of America.

6. Defendant DFW Integrity Taxpros Services, LLC (d/b/a Integrity Tax Pros) (“Tax Pros”), is a limited liability corporation incorporated in Texas on or about February 28, 2022. It employs individuals who prepare tax returns for compensation at its multiple tax preparation stores that operate under the name “Integrity Tax Pros,” including Texas stores located in North Richland Hills, Azle, Watauga, Haltom City, Hurst, and Saginaw. Although only incorporated in 2022, Tax Pros has been preparing tax returns since at least 2013.

7. Defendant Amberley Ritter owns and operates Defendant Tax Pros and has prepared tax returns for compensation since at least 2014. On or about May 6, 2024, Ritter

formed a tax preparation business named Legacy Tax, LLC, doing business as Legacy Taxes in Springtown, Texas. Ritter was initially identified as the manager of Legacy Tax, LLC. In addition to preparing tax returns, Ritter employs, and has employed, either directly or through Tax Pros or another entity, one or more persons who prepare tax returns for compensation. Ritter resides in Azle, Texas.

8. Defendant Wesley Franklin owns and operates Defendant Tax Pros and has prepared tax returns for compensation since at least 2018. On or about November 26, 2024, Franklin became a manager of Legacy Tax, LLC. In addition to preparing tax returns, Franklin employs, and has employed, either directly or through Tax Pros or another entity, one or more persons who prepare tax returns for compensation. Franklin resides in Saginaw, Texas.

9. Defendant Mark Burkart owns and operates Defendant Tax Pros and has prepared tax returns for compensation since at least 2012. In 2025, Burkart, with Defendant Garner, formed a tax preparation business named Tax Force. In addition to preparing tax returns, Burkart employs, and has employed, either directly or through Tax Pros or another entity, one or more persons who prepare tax returns for compensation. Burkart resides in Aledo, Texas.

10. Defendant Kenneth Garner acted as the General Manager overseeing Tax Pros stores and has prepared tax returns for compensation since at least 2020. In 2025, Garner, with Defendant Burkart, formed a tax preparation business named Tax Force. Garner resides in Fort Worth, Texas.

Overview of Defendants' Tax Preparation Practices

11. The Defendants make, and direct or encourage others to make, false claims on customers' tax returns, including: fabricating self-employed business income and expenses, making false claims for the Earned Income Tax Credit ("EITC"), claiming improper filing

statuses such as Head of Household for married individuals, reporting bogus education credits, and engaging in other grossly incompetent, negligent, reckless, and/or fraudulent activities that improperly inflate customers' tax refunds and, in turn, the preparation fees that the Defendants receive.

12. The Defendants, and others acting at their direction or with their knowledge and consent, created and maintained policies and practices at Tax Pros under which they expressly promote, aid, advise, and/or assist in the preparation of false and fraudulent federal income tax returns by tax return preparers. Tax return preparers at Tax Pros prepare false and fraudulent tax returns and engage in other deceptive conduct that interferes with the enforcement of the internal revenue laws, for the purpose of significantly and illegally enlarging the Defendants' profits and which has resulted in losses to the U.S. Treasury.

13. On February 28, 2022, a Certificate of Formation was filed for Tax Pros with the Texas Secretary of State. The Certificate identified Ritter, Franklin, and Burkart as the managers of Tax Pros.

14. Tax Pros operated under multiple registered names, associated with each of its store locations, including Integrity Taxpros Azle, Integrity Taxpros Watauga, Integrity Taxpros Saginaw, Integrity Taxpros NRH (North Richland Hills), Integrity Taxpros Haltom City, and Integrity Taxpros Hurst.

15. Each Tax Pros store used an Electronic Filing Number ("EFIN") that Franklin applied for and obtained from the IRS, whose numbers (with the first 3 numbers redacted) end in XXX756, XXX921 (for Integrity Taxpros Azle), XXX958 (for Integrity Taxpros Saginaw), XXX959 (for Integrity Taxpros Hurst), XXX960 (for Integrity Taxpros Watauga), XXX961 (for Integrity Taxpros Haltom City), and XXX962 (for Integrity Taxpros NRH).

16. Tax Pros operated websites where it promoted and advertised its tax preparation services, including integritytaxpros.net, www.facebook.com/DFWTAXPROS, www.facebook.com/TaxProsNorthRichlandHills, and www.facebook.com/taxproshurst. In 2025, knowing of the investigation into its tax preparation practices by the IRS, the Defendants removed these websites from the internet.

17. The Defendants mislead and deceive customers and potential customers through statements made on these Tax Pros websites. For example, the Defendants promise “GUARANTEED ACCURACY,” including an “Assurance of Precise and Accurate Tax Calculations.” The Defendants know these statements are false because they know that they, and those acting at their direction or with their knowledge and consent, are preparing tax returns making false claims without the customers’ knowledge or consent.

18. The Defendants do not require the tax return preparers that they employ to have any tax return preparation experience, knowledge of federal tax laws, or minimum education. The Defendants expect the tax return preparers they employ to follow the Defendants’ policies and directives, including preparing tax returns making false claims and charging customers high fees.

19. Ritter and Garner train tax return preparers at Tax Pros. Ritter and Garner fail to teach basic elements related to accurate tax return preparation. This inadequate training contributes to the preparation of federal tax returns making grossly incompetent, negligent, reckless, false, and/or fraudulent claims. The training that Ritter and Garner do provide aids, assists, and advises preparers at Tax Pros to prepare false or fraudulent tax returns. This includes, but is not limited to, training Tax Pros tax return preparers to prepare false Forms Schedule C

that report fabricated income to improperly reduce customers' taxable income and thereby generate a bogus, inflated refund.

20. From 2022 through 2025, tax return preparers working for Tax Pros prepared the following number of federal income tax returns for customers, as identified by the EFINs associated with Tax Pros:

Filing Season	Number of Returns Filed at Tax Pros
2022	4,785
2023	5,105
2024	6,375
2025	2,611
Total	18,876

21. The Defendants charge customers to prepare the customers' income tax returns. The Defendants charge fees based on either a percentage of the refund generated or the number and type of the forms attached to the tax returns. The Defendants' tax preparation fees are, in the vast majority of instances, taken directly from the customers' tax refunds.

22. The Defendants also promoted the preparation of false tax returns through a financial bonus program which incentivized Tax Pros preparers to prepare tax returns claiming larger refunds (including through the inclusion of forms making false claims, such as Form Schedule C) which, in turn, result in higher fees paid to the Defendants.

23. The Defendants are tax return preparers under 26 U.S.C. § 7701(a)(36). Section 7701(a)(36) defines a "tax return preparer" as a person who prepares tax returns for compensation, or "who employs one or more persons" to prepare tax returns for compensation. Ritter, Franklin, Burkart, and Garner all have personally prepared federal tax returns for compensation. Ritter, Franklin, and Burkart, individually and/or through Tax Pros or another entity, employ one or more persons to prepare federal tax returns for compensation.

The Defendants' Unlawful Return Preparation Practices

24. The Defendants, and those acting at their direction or with their knowledge and consent, prepare federal income tax returns in a manner that generates inflated and unwarranted refunds for customers, enabling the Defendants to charge high and undisclosed fees and maximize their own profits at the expense of the United States Treasury.

25. Many of the Defendants' customers lack knowledge regarding tax law and tax return preparation. Customers often have no knowledge that the Defendants have prepared and filed false or fraudulent tax returns on their behalf.

26. The Defendants, and those acting at their direction or with their knowledge and consent, make false claims on tax returns, particularly on the forms attached to those returns, to improperly decrease their customers' reported taxable income and thereby increase the customers' refunds.

27. The Defendants, and those acting at their direction or with their knowledge and consent, claim on customers' tax returns a refund amount that is not based on the customer's actual income, expenses, deductions, and applicable qualifying credits. Instead, the refund is based on fabricated income, expenses, deductions, and credits reported by the Defendants and those acting at their direction or with their knowledge and consent. The Defendants guarantee their customers a "maximum refund" and they deliver that inflated refund due to the fabricated income, expenses, deductions, and credits that they, and those acting at their direction or with their knowledge and consent, report on customers' tax returns.

28. The Defendants charge high fees that are typically deducted directly from the customer's tax refund, often without informing the customer of the amount that the Defendants actually charged for preparing the tax return.

29. The Defendants engage in unlawful tax return preparation practices including:
- a. Fabricating businesses and related business income and expenses reported on Forms Schedule C;
 - b. Making false claims for the Earned Income Tax Credit;
 - c. Circumventing or disregarding due diligence requirements when claiming tax credits, including the Earned Income Tax Credit;
 - d. Claiming education credits to which their customers are not entitled;
 - e. Claiming improper filing statuses, such as Head of Household for married individuals;
 - f. Fabricating itemized deductions, including for unreimbursed employee business expenses, on Forms Schedule A;
 - g. Falsely claiming COVID-19-related tax credits for the cost of providing paid sick and family leave wages;
 - h. Fabricating purported “household” or “household help” income;
 - i. Failing to identify the actual paid preparer of the tax return;
 - j. Failing to provide customers with a copy of the completed tax return; and
 - k. Charging unconscionable and undisclosed fees.

Fabricated Schedule C Business Income and Expenses

30. Individual taxpayers who are self-employed or operate a business as a sole proprietorship must report the business’s income and expenses on a Form Schedule C (Profit or Loss from Business – Sole Proprietorship), which is filed with the taxpayer’s Form 1040 Individual Income Tax Return. The net figure reported on a Schedule C, whether a profit or a loss, is a component of the individual’s adjusted gross income.

31. The Defendants, and those acting at their direction or with their knowledge and consent, prepare tax returns reporting non-existent businesses on Forms Schedule C. Typically the false Forms Schedule C report that the customer owns or operates a business that incurred

massive losses. The Defendants know, or should know, that these tax returns contain false or fraudulent businesses and false or fraudulent losses on Form Schedule C.

32. The Defendants, and those acting at their direction or with their knowledge and consent, deliberately understate their customers' income by reporting the existence of fictitious businesses with losses, or alternatively by inflating losses of a customer's real sole proprietorship business. The false business losses lower the taxable income of a customer who has actual income (such as wages reported on a W-2) to either bring the income within the EITC "sweet spot" (that maximizes the EITC that is claimed) or simply to create a phony business loss to offset the customer's wages and falsely or fraudulently reduce the customer's income tax liability. These fake losses often result in large, bogus tax refunds, from which the Defendants profit by taking a portion as fees.

33. The Defendants are aware of these unlawful tax preparation practices because tax preparers working at Tax Pros are trained by the Defendants to engage in them. The Defendants conduct mandatory training sessions for Tax Pros preparers to implement their Schedule C loss scheme.

34. The Defendants provide instruction sheets to Tax Pros tax return preparers that direct the preparers to input specific information into tax preparation software to create a large bogus refund for customers. The materials instruct preparers how to fabricate business losses on Forms Schedule C and how to report phony expenses in a manner that the Defendants believe will evade IRS detection. The "Safe Zones" guidelines instruct:

- The self-employed business description on the Schedule C "needs to match as closely as possible to [the] occupation" of the customer;
- Gross receipts or sales should be reported in an amount "usually \$300-\$1500" depending on the customer's adjusted gross income;

- “Never end” an expense reported on the Schedule C “with a five or a zero unless” the customer has a receipt, and “round down” numbers, for example from “\$500 ...to \$498”;
- The expenses reported on a Schedule C should be for office expenses, supplies, repairs and maintenance, and car and truck expenses; and
- Dates reported on the Schedule C identifying when a vehicle was placed in business use “will always be between 1/1 to 1/10 of the current tax year” but “do not use the same date on every return” and “always check the first, third & forth [sic] box” in the tax preparation software.

35. Under law, however, amounts and information reported on tax returns may not be pre-determined by tax return preparers. Rather, reported amounts and information must be based on an individual’s actual income and expenses.

36. Consistent with the “Safe Zones” instructions, the Defendants, and those acting at their direction or with their knowledge and consent, commonly report fabricated expenses on Forms Schedule C for car and truck expenses, office expenses, repairs and maintenance expenses, and supply expenses.

37. The use of fake Schedule C losses by tax preparers at Tax Pros to falsely reduce a customer’s reported income is pervasive and occurred during multiple tax seasons. For tax returns identified as prepared at Tax Pros from 2022 to 2025, 9,894 of 18,876 tax returns (over 52%) reported Schedule C losses. These tax returns reported an average loss exceeding \$15,202, as follows:

Filing Season	Total Number of Returns Filed	Number of Returns Reporting Net Loss on Schedule C	Total Amount of Net Losses Claimed on Schedule C	Average Amount of Net Loss Claimed on Schedule C
2022	4,785	2,694	\$38,165,376	\$14,172
2023	5,105	3,041	\$45,929,434	\$15,108
2024	6,375	3,459	\$56,985,269	\$16,479
2025	2,611	700	\$9,335,441	\$13,336
Total	18,876	9,894	\$150,415,520	\$15,202.70

38. The IRS interviewed 39 customers of Tax Pros whose tax returns were prepared in 2023 or 2024. Of these 39 customers, 35 reported that their tax return contained false information on a Schedule C. In fact, 29 of them did not have a business at all and did not tell the preparers at Tax Pros that they operated any business. The average tax deficiency on the 35 returns with a false Schedule C was \$3,194.65.

39. The IRS also examined tax returns prepared at Tax Pros in 2022 or 2023. For 2022, the IRS assessed additional tax for 41 of the 45 returns. The tax deficiency from these 41 returns totaled \$245,300, or \$5,983 per return. For 2023, the IRS assessed additional tax for 14 of the 16 returns. The tax deficiency from these 14 returns totaled \$88,775, or an average of \$6,341 per return.

**Phony Claims for the Earned Income Tax Credit
and Failure to Comply with Due Diligence Requirements**

40. The Defendants, and those acting at their direction or with their knowledge and consent, prepare tax returns that include fraudulent claims for the EITC, often based on fabricated business income and expenses.

41. The EITC is a refundable tax credit available to certain low-income working people. The amount of the credit is based on the taxpayer's income, filing status, and number of dependents. Because the EITC is a refundable credit, claiming an EITC can, in certain circumstances, reduce a taxpayer's federal tax liability below zero, thereby entitling the taxpayer to a payment from the U.S. Treasury.

42. Due to the method used to calculate the EITC, an individual can claim a larger EITC by claiming multiple dependents and, for certain income ranges, individuals with higher earned income are entitled to a larger credit than those with lower earned income. The amount of

the credit increases as income increases between \$1 and a set maximum income amount, and then gradually decreases to zero as income increases beyond that amount.

43. For example, in tax year 2023 the maximum EITC was \$7,430 and was available to eligible individuals with three dependent children who earned income between \$16,500 and \$21,600. Some tax preparers who manipulate reported income to maximize the EITC refer to this range of earned income corresponding to a maximum EITC as the “sweet spot” or “golden range.”

44. Because of the way the EITC is calculated, reporting more income, up to a certain point, allows customers to receive a larger refundable credit. Similarly, claiming losses to decrease the total reported income allows customers to claim a larger refundable credit.

45. The Defendants, and those acting at their direction or with their knowledge and consent, report false information to claim the maximum EITC for customers. For example, to bring the customer’s reported earned income within the “sweet spot” for the EITC, and depending on a customer’s actual income, the Defendants, and those acting at their direction or with their knowledge and consent, fabricate business expenses reported on a Schedule C to falsely or fraudulently decrease customers’ reported earned income. By improperly reducing a customer’s reported earned income, the Defendants, and those acting at their direction or with their knowledge and consent, unlawfully claim the EITC, or a larger EITC than the customer is entitled to based on the customer’s actual earned income.

46. Because of the potential for abuse in claiming the EITC, Congress has authorized the Secretary of the Treasury to impose due diligence requirements on federal tax return preparers claiming the EITC for their customers. The resulting due diligence requirements obligate a tax return preparer to make reasonable inquiries to ensure the customer is legitimately

entitled to the EITC. The tax return preparer may not ignore the implications of information furnished to (or known by) the tax return preparer, and the tax return preparer must make reasonable inquiries if a reasonable and well-informed tax return preparer knowledgeable in the law would conclude that the information furnished to the tax return preparer appears to be incorrect, inconsistent, or incomplete. Tax return preparers also must document their compliance with these requirements and keep that documentation for three years.

47. The Defendants, and those acting at their direction or with their knowledge and consent, fail to comply with the due diligence requirements. It is inherently impossible to comply with the due diligence requirements when fabricating information reported on a tax return to claim the EITC. The Defendants, and those acting at their direction or with their knowledge and consent, show an intentional disregard for the tax laws and particularly for the due diligence requirements.

Bogus Education Credits

48. The Defendants, and those acting at their direction or with their knowledge and consent, claim bogus education expenses and falsely claim refundable education credits, including the American Opportunity education credit, on customers' federal income tax returns. Unlike many tax credits, a refundable tax credit entitles qualifying taxpayers to receive refunds even if they have no tax liability. The Defendants, and those acting at their direction or with their knowledge and consent, claim false education credits on the tax returns of customers who did not attend college during the tax year and thus had no qualifying education expenses, in order to generate a larger bogus refund.

49. Educational institutions prepare and submit to the IRS, and provide a copy to the student, an IRS Form 1098-T to show qualifying tuition expenses billed to students and the amounts of any scholarships or grants provided to students.

50. For the Defendants' customers who did in fact have qualifying education expenses, the claimed credits were often fabricated or otherwise did not match the information provided by the educational institution on the Forms 1098-T. Thus, the Defendants, and those acting at their direction or with their consent, disregard the tuition amount customers actually paid and improperly claim larger amounts, up to the maximum \$4,000, as qualified tuition expenses.

Intentionally Claiming an Improper Filing Status

51. The Defendants, and those acting at their direction or with their knowledge and consent, prepare tax returns reporting false filing status. Specifically, Head of Household filing status is claimed on customers' tax returns to increase the amount of the customers' standard deduction, when the Defendants, and those acting at their direction or with their knowledge and consent, know that the customer does not qualify for Head of Household filing status.

52. The Defendants, and those acting at their direction or with their knowledge and consent, often improperly prepare tax returns for customers whom they know are married by falsely reporting the "Head of Household" filing status, which is unavailable to married couples living together. This results in the customer's return claiming a higher standard deduction, thereby falsely reducing their reported taxable income.

53. Often, claiming Head of Household filing status is an attempt to increase the claimed EITC; a qualifying couple with at least two children who, together, might otherwise receive a single EITC refund of \$5,000 by properly claiming "married, filing jointly," may

instead each unlawfully receive a refund of \$3,000 or more, by both falsely claiming Head of Household or single status and each claiming at least one dependent.

Bogus Schedule A Deductions

54. The Defendants, and those acting at their direction or with their knowledge and consent, prepared tax returns reporting bogus itemized deductions on Form Schedule A (“Itemized Deductions”) to improperly or fraudulently reduce customers’ taxable income.

55. For example, the Defendants prepared tax returns for customers that include Forms Schedule A making false claims for purported unreimbursed employee business expenses. Section 162 of the Internal Revenue Code governs trade or business expenses. The Defendants often claimed deductions for fabricated, fraudulently inflated, and/or non-qualifying business expenses, particularly for purported business miles driven by customers.

56. The Defendants asked customers whether they incurred expenses for personal expenditures such as rent, cell phones, and clothing, or asked how far customers drive when commuting to and from their jobs, without explaining to customers that these expenses are actually non-deductible. The Defendants then falsely reported these non-deductible expenses as deductible employee business expenses in amounts that the Defendants often fabricated in order to maximize the customer’s refund. In instances where customers did have actual qualifying and deductible expenses, such as for charitable contributions, the Defendants reported a falsely inflated amount of the expense that the customer incurred, to improperly increase the tax refund claimed on the return.

57. Beginning with tax year 2018 tax returns, Form Schedule A is no longer used to report unreimbursed employee business expenses and certain other deductions or adjustments to income, which are now reported on Form Schedule 1 (“Additional Income and Adjustments to

Income”). Additionally, certain expenses may no longer be claimed as deductions on tax returns. Unreimbursed employee business expenses now may only be claimed by specific categories of individuals: Armed Forces reservists, qualified performing artists, fee-basis state or local government officials, and employees with impairment-related work expenses.

58. As a result, on tax year 2018 and subsequent tax returns, the Defendants, and those acting at their direction or with their knowledge and consent, improperly report bogus or falsely inflated unreimbursed employee business expenses (such as non-deductible commuting mileage) on Forms Schedule C, even though their customers are not self-employed and did not own or operate a business. Such expenses may not be claimed on a Form Schedule C. But the Defendants report these bogus or falsely inflated job-related expenses on Form Schedule C because they can no longer report them on Form Schedule A.

False COVID-19 Credits

59. Congress passed the Families First Coronavirus Response Act (the “FFCRA”) in response to the COVID-19 pandemic and its economic impact. The FFCRA provides small and midsize employers refundable tax credits that reimburse them, dollar-for-dollar, for the cost of providing paid sick and family leave wages to their employees for leave related to COVID-19. Certain self-employed individuals in similar circumstances also are entitled to credits for being unable to work due to a COVID-19 illness.

60. The FFCRA gives self-employed individuals and businesses with fewer than 500 employees funds to provide employees with paid sick and family and medical leave, either for the employee’s own health needs or to care for family members. Workers may receive up to 80 hours of paid sick leave for their own health needs or to care for others and up to an additional ten weeks of paid family leave to care for a child whose school or child care provider is closed or

unavailable due to COVID-19 precautions. IRS Forms 7202, “Credits for Sick Leave and Family Leave for Certain Self-Employed Individuals,” must be submitted to claim the refundable tax credits.

61. The amount of the FFCRA credit is based on the individual’s “net earnings from self-employment” and the number of days the individual was unable to perform services due to the specified circumstances related to COVID-19.

62. The Defendants make false claims for the COVID-19-related tax credits on IRS Form 7202. Because the FFCRA credit is only available to self-employed individuals or small businesses, the Defendants falsely report that customers are self-employed. The Defendants then falsely claim that the customers were unable to work (at their non-existent business) due to COVID-19 and report a bogus amount of the customers’ “net earnings from self-employment.” In other instances, where a customer may be self-employed, the Defendants report net earnings on the Form 7202 that do not match the customer’s actual net earnings from self-employment. The Defendants then claim false or fraudulent FFCRA credits on the Form 7202.

Fabricating, or Falsely Reporting Self-Employment Income as, “Household” Wages

63. The Defendants, and those acting at their direction or with their knowledge and consent, prepare tax returns improperly claiming phony income referred to as “household” or “household help” (abbreviated as “HSH”) income on line 7 of the Form 1040 tax return. The Defendants, and those acting at their direction or with their knowledge and consent, often claim this income on the tax returns of customers who did not earn this income, are not self-employed, and did not receive income through self-employment, but for whom the preparers need to fabricate additional income in order to falsely claim a larger EITC.

64. Often the Defendants, and those acting at their direction or with their knowledge and consent, report “household” income for customers who are self-employed as babysitters or house cleaners, and whose income must be reported as self-employment (not wages) on a Schedule C. In these instances, related self-employment taxes must be reported and paid. *See* 26 U.S.C. § 6017. Self-employed individuals “having net earnings from self-employment of \$400 or more for the taxable year shall make a return with respect to the self-employment tax imposed by chapter 2.” 26 U.S.C. § 6017. Self-employed individuals do not have self-employment taxes (for Social Security and Medicare) deducted from their paychecks by employers, as wage-earners do. Such tax returns give the illusion that the customers were wage earners and that social security and Medicare taxes were withheld by an employer. In reality, customers are not receiving Forms W-2 or 1099 and taxes (including for Social Security and Medicare) are not being withheld or reported to the IRS.

65. By falsely reporting self-employment income as wages, the Defendants, and those acting at their direction or with their knowledge and consent, do not prepare Forms Schedule C or Schedule SE (used to report the self-employment tax) and fail to report self-employment taxes, which accounts for a tax totaling 15.3% of the self-employment income. *See* 26 U.S.C. § 1401(a) and (b). Most importantly, these customers did not have income taxes withheld from their income, and did not have social security or Medicare taxes withheld. The Defendants, and those acting at their direction or with their knowledge and consent, are required to report these self-employment taxes on their customers’ tax returns.

66. In instances where the customers actually earn the reported income (i.e. it is not totally fabricated by the Defendants), the Defendants, and those acting at their direction or with their knowledge and consent, use the purported HSH income to *increase* a customer’s taxable

income to hit the EITC “sweet spot” for a larger or maximum credit, while also improperly avoiding reporting the 15.3% self-employment tax. Thus, reporting self-employment income as wages not only improperly circumvents the self-employment tax requirement, but it often generates a larger tax refund for a customer by increasing their taxable income and thereby maximizing the EITC.

**Failure to Identify the Actual Preparer of Customers’ Tax Returns
in Violation of 26 U.S.C. §§ 6695(b) and 6695(c)**

67. The Defendants prepare tax returns for customers on which they do not identify themselves as the paid preparer. Many tax returns identifying one individual as the paid preparer were actually prepared by another individual who was not properly identified on the tax return.

68. Ritter and Garner also modified tax returns, prepared by other tax preparers at Tax Pros, to generate a large and bogus refund for customers. To do this, Ritter and Garner would log into the tax preparation software after the Tax Pros tax preparer prepared the return (but before filing the tax return with the IRS), remove income or add false expenses (such as Schedule C losses) on the customer’s tax return to decrease the reported taxable income and increase the refund, and then file the tax return that still identified the original Tax Pros preparer as the paid preparer.

69. In 2025, Garner prepared tax returns for customers using Turbo Tax software. Garner falsely reported on these tax returns that they were self-prepared by the customer. The IRS refers to tax return preparers who do not identify themselves as the paid preparer on tax returns they prepare, and particularly those who falsely report on the tax return that the customer self-prepared the return, as “ghost preparers.” In at least 2025, Garner acted as a ghost preparer.

70. A tax return preparer who fails to sign a tax return that he or she prepares violates 26 U.S.C. § 6695(b). A tax return preparer, or employer of a tax return preparer, who fails to

report an identifying number of the tax return preparer or the employer on a tax return that the preparer or an employee prepares, violates 26 U.S.C. § 6695(c).

Unconscionable and Undisclosed Fees

71. The Defendants charge unconscionably high fees – as much as \$1,200 or more – to prepare tax returns. The fees typically are charged without their customers’ knowledge. The Defendants charged these high fees to prepare and file false tax returns with unnecessary and bogus forms and schedules attached, such as a Schedule C, when they should have honestly prepared a basic Form 1040 tax return.

72. The Defendants charge fees based on the amount of the tax refund they improperly obtain for customers, or by the number and type of (often unnecessary) forms attached to the customer’s tax return. For example, the “Safe Zones” instruction sheet provided to preparers states that “we still charge a minimum of \$500 for a Schedule C done on W2.” So a fake Schedule C prepared for an employed individual who, in reality, only has income reported on a Form W-2 (and only requires a Form 1040) mandates a minimum \$500 charge.

73. The instruction sheet further states that Tax Pros “has a new formula for fees this year” whereby the preparer takes a “new” refund amount and subtracts “the original refund amount,” then divides that number by two and subtracts \$300. The example included on the instruction sheet shows where the “new refund amt” minus the “original refund amt” equals \$1,902, divided by 2 is \$951, and when subtracting \$300 the resulting fee is \$651. Of course, there should not be an “original” refund amount and a “new” refund amount. This further illustrates the improper benefits the Defendants obtained by fabricating “new” refund amounts by adding false information to tax returns to gin up a refund.

74. Their high tax preparation fees are a strong incentive for the Defendants, and those acting at their direction or with their knowledge and consent, to prepare and file false or fraudulent returns claiming excessive refunds based on bogus claims and associated forms and schedules.

75. The Defendants' high fees frequently can pose a significant financial hardship for customers. Customers may be required to pay back to the IRS the improper refunds that they receive. Because the Defendants routinely deduct their high fees directly from their customers' refunds, customers required to return these improper refunds to the government must also return the portion subtracted as fees. Thus, customers are then out-of-pocket the fees that the Defendants charged.

76. The Defendants intentionally deceive customers regarding the fees charged for the preparation of tax returns.

77. The Defendants, and those acting at their direction or with their knowledge and consent, also routinely and intentionally fail to disclose to customers all fees charged. The Defendants, and those acting at their direction or with their knowledge and consent, present forms to customers to sign, including a form acknowledging the fees charged, without allowing the customer to closely review or understand the forms they are signing. Alternatively, the Defendants, and those acting at their direction or with their knowledge and consent, tell customers one amount for fees and then later increase the fees without the customers' knowledge or consent.

78. The Defendants' fees usually are not paid out-of-pocket by customers at the time of the preparation of their tax returns, but instead are subtracted by the Defendants from their customers' tax refunds. By doing so, the Defendants can conceal the actual amount that the

customers pay to have their tax return prepared. Customers typically do not discover the sizeable fees charged for the preparation of their tax returns until the customers receive a refund that is much less than quoted by the tax return preparer.

79. Customers often are surprised to learn that the refund requested on their return is hundreds, if not thousands, of dollars more than the refund amount that they received after the fees were deducted.

80. The Defendants' practice of charging large and undisclosed fees interferes with the administration and enforcement of the Internal Revenue laws. Such behavior erodes consumer confidence in tax return preparers and dissuades taxpayers from seeking professional assistance with the preparation of their federal tax returns.

Examples of the Defendants' Illegal Conduct

Customers 1 and 2

81. Tax Pros prepared the 2017, 2018, 2019, 2020, 2021, 2022, and 2023 federal income tax returns of Customers 1 and 2 of Fort Worth, Texas. Although Ritter prepared most of these tax returns, Ritter told Customers 1 and 2 that she would put another preparer's name on the tax return so that preparer would get credit for preparing a tax return. Ritter told Customers 1 and 2 in 2024 that she did not have a PTIN that year such that another preparer would prepare their 2023 tax return.

82. Neither Customer 1 nor Customer 2 have owned or operated a business since 2017. Since 2017, Customer 1 was employed at several jobs, including as a plumber and in a warehouse, and Customer 2 was employed in the nursing industry.

2017 Tax Return

83. Ritter prepared the 2017 federal income tax return of Customers 1 and 2, although she falsely identified another individual as the paid preparer. Throughout the years that Tax Pros prepared the tax returns of Customers 1 and 2, Ritter questioned Customers 1 and 2 about their commuting mileage and falsely told Customers 1 and 2 that commuting mileage could be written off as a deductible expense.

84. Ritter falsely reported on the Schedule A and related Form 2106 attached to the 2017 tax return of Customers 1 and 2 that Customer 1 incurred \$17,228 in unreimbursed employee business expenses for purportedly driving 32,201 miles for his job. Customer 1 did not drive at all for his job in 2017 and, even if this figure represents commuting miles (which are non-deductible), he did not drive that many miles to and from work in 2017.

85. Ritter also falsely reported on the Schedule A that Customer 2 incurred \$9,043 in unreimbursed employee business expenses for purportedly driving 16,902 miles for her job. Customer 2 did not drive at all for her job in 2017 and, even if this figure represents commuting miles (which are non-deductible), she did not drive that many miles to and from work in 2017.

86. Ritter also falsely reported on Schedule A as an unreimbursed job-related expense a \$2,300 personal expense for “home improvements.” Finally, Ritter also falsely claimed that Customers 1 and 2 contributed \$11,336 by cash or check to charity in 2017.

87. These false claims resulted in Ritter claiming a bogus and unwarranted refund of \$4,559 on the 2017 tax return of Customers 1 and 2 which the IRS issued.

2018 Tax Return

88. Burkart prepared the 2018 federal income tax return of Customers 1 and 2, although he falsely identified another individual as the paid preparer.

89. On the 2018 tax return of Customers 1 and 2, Burkart falsely reported on the Schedule C that Customer 1 operated a business, not identified by name or type of business, that earned \$952 but incurred \$32,691 in business expenses, including \$19,136 in car and truck expenses, \$10,563 for insurance, and \$1,692 in supplies, resulting in a net business loss of \$31,739.

90. Customer 1 did not incur these business expenses and did not tell Burkart that he owned a business or incurred business expenses in 2018.

91. Burkart falsely reported on another Schedule C that Customer 2 operated a business, not identified by name or type of business, that earned \$713 but incurred \$11,736 in business expenses, including \$9,376 in car and truck expenses, \$1,510 for an office expense, and \$850 in supplies, resulting in a net business loss of \$11,023.

92. Customer 2 did not incur these business expenses and did not tell Burkart that she owned a business or incurred business expenses in 2018.

93. These fabricated Schedule C losses improperly reduced the reported taxable income of Customers 1 and 2 and resulted in the 2018 tax return claiming a bogus and unwarranted refund of \$1,671 which the IRS issued.

2019 Tax Return

94. Ritter prepared the 2019 federal income tax return for Customers 1 and 2, although she falsely identified another individual as the paid preparer.

95. On the 2019 tax return of Customers 1 and 2, Ritter falsely reported on the Schedule C that Customer 1 operated a plumbing business that earned \$952 (the same amount of gross receipts reported on the Schedule C attached to the 2018 tax return) but incurred \$23,500

in business expenses, including \$20,788 in car and truck expenses, \$1,419 for an office expense, and \$1,293 in supplies, resulting in a net business loss of \$22,548.

96. Customer 1 did not incur these business expenses and did not tell Ritter that he owned a business or incurred business expenses in 2019.

97. Ritter falsely reported on another Schedule C that Customer 2 operated a medical business that earned \$782 but incurred \$13,201 in business expenses, including \$10,811 in car and truck expenses, \$1,468 for an office expense, and \$922 in supplies, resulting in a net business loss of \$12,419.

98. Customer 2 did not incur these business expenses and did not tell Ritter that she owned a business or incurred business expenses in 2019.

99. These fabricated Schedule C losses improperly reduced the reported taxable income of Customers 1 and 2 and resulted in the 2019 tax return claiming a bogus and unwarranted refund of \$3,079 which the IRS issued.

2020 Tax Return

100. Ritter prepared the 2020 federal income tax return for Customers 1 and 2, although she falsely identified another individual as the paid preparer.

101. On the 2020 tax return of Customers 1 and 2, Ritter falsely reported on the Schedule C that Customer 1 operated a plumbing and heating business that earned \$1,162 but incurred \$28,830 in business expenses, including \$20,011 in car and truck expenses, \$920 for advertising, \$2,988 in office expenses, \$1,450 in repairs and maintenance, and \$3,461 in supplies, resulting in a net business loss of \$27,668.

102. Customer 1 did not incur these business expenses and did not tell Ritter that he owned a business or incurred business expenses in 2020.

103. This fabricated Schedule C loss improperly reduced the reported taxable income of Customers 1 and 2 and resulted in the 2020 tax return claiming a bogus and unwarranted refund of \$2,249 which the IRS issued.

2021 Tax Return

104. Ritter prepared the 2021 federal income tax return for Customers 1 and 2, although she falsely identified another individual as the paid preparer.

105. On the 2021 tax return of Customers 1 and 2, Ritter falsely reported on the Schedule C that Customer 1 operated a plumbing and heating business that earned \$802 but incurred \$33,642 in business expenses, including \$21,675 in car and truck expenses, \$752 for advertising, \$4,284 in office expenses, \$650 in repairs and maintenance, and \$6,281 in supplies, resulting in a net business loss of \$32,840.

106. Customer 1 did not incur these business expenses and did not tell Ritter that he owned a business or incurred business expenses in 2021.

107. This fabricated Schedule C loss improperly reduced the reported taxable income of Customers 1 and 2 and resulted in the 2021 tax return claiming a bogus and unwarranted refund of \$2,761 which the IRS issued.

2022 Tax Return

108. Ritter prepared the 2022 federal income tax return for Customers 1 and 2, although she falsely identified another individual as the paid preparer.

109. On the 2022 tax return of Customers 1 and 2, Ritter falsely reported on the Schedule C that Customer 2 operated a home health care business that earned \$1,824 but incurred \$32,874 in business expenses, including \$22,288 in car and truck expenses, \$2,881 in

office expenses, \$908 in repairs and maintenance, \$3,482 in supplies, \$1,899 in overnight travel expenses, and \$1,416 for utilities, resulting in a net business loss of \$31,050.

110. Customer 2 did not incur these business expenses and did not tell Ritter that she owned a business or incurred business expenses in 2022.

111. This fabricated Schedule C loss improperly reduced the reported taxable income of Customers 1 and 2 and resulted in the 2022 tax return claiming a bogus and unwarranted refund of \$4,250 which the IRS issued.

2023 Tax Return

112. A preparer at Tax Pros prepared the 2023 federal income tax return of Customers 1 and 2.

113. On the 2023 tax return, the Tax Pros preparer falsely reported on the Schedule C that Customer 1 operated a plumbing and heating business that earned \$1,348 but incurred \$19,031 in business expenses, including \$1,210 in car and truck expenses, \$1,053 in office expenses, \$2,069 in repairs and maintenance, and \$1,694 in supplies, resulting in a net business loss of \$17,683.

114. Customer 1 did not incur these business expenses and did not tell the preparer that he owned a business or incurred business expenses in 2023.

115. This fabricated Schedule C loss improperly reduced the reported taxable income of Customers 1 and 2 and resulted in the 2023 tax return claiming a bogus and unwarranted refund of \$1,513 which the IRS issued.

116. Nobody at Tax Pros ever reviewed the completed 2023 income tax returns with Customers 1 and 2, who were unaware of the false information reported on their tax returns. The

only tax return that Customers 1 and 2 received a copy of was their 2021 tax return. Customers 1 and 2 also complained to Tax Pros about the high fees they charged to prepare the tax returns.

Customers 3 and 4

117. Tax Pros prepared the 2018, 2019, 2020, 2021, and 2022 federal income tax returns of Customers 3 and 4 of Paradise, Texas, at the Tax Pros offices in Haltom City, Watauga, and Saginaw, Texas.

118. Neither Customer 3 nor Customer 4 owned or operated a business during the period that Tax Pros prepared their tax returns. During this period, Customer 3 worked at a chemical supplier and Customer 4 worked as a nurse.

119. Throughout the years that Tax Pros prepared the tax returns of Customers 3 and 4, the various preparers questioned Customers 3 and 4 about their commuting mileage to and from their jobs and any other expenses they may have for their jobs, such as clothing.

120. Because they owed tax for 2020, 2021, and 2022, Customers 3 and 4 had to pay Tax Pros at the time their tax returns were prepared.

121. Customers 3 and 4 paid Tax Pros \$1,800 to have one of their tax returns prepared but Customer 3 cannot remember the year. It was likely for the 2020 return because Garner told Customer 3 that the computer would not let Tax Pros charge more than \$1,200, and Customer 3 does not have a computer-printed invoice for the 2020 tax return preparation.

122. Customer 3 also paid cash tips to the preparers at Tax Pros, at the preparers' request.

2018 Tax Return

123. On the 2018 tax return of Customers 3 and 4, the Tax Pros preparer falsely reported on the Schedule C that Customer 4 operated a nursing business that earned \$1,285 but

incurred \$31,820 in business expenses, including \$19,045 in car and truck expenses, \$1,664 in mortgage interest, \$1,055 for an office expense, \$6,200 in repairs and maintenance, \$3,481 in supplies, and \$375 in taxes and licenses, resulting in a net business loss of \$30,535.

124. Customer 4 did not incur these business expenses and did not tell the preparer that she owned a business or incurred business expenses in 2018. Any actual mortgage expense would have been for the home of Customers 3 and 4, which is a non-deductible personal expense and not a deductible business expense.

125. This fabricated Schedule C loss improperly reduced the reported taxable income of Customers 3 and 4 and resulted in the 2018 tax return claiming a bogus and unwarranted refund of \$7,611 which the IRS issued.

2019 Tax Return

126. On the 2019 tax return of Customers 3 and 4, the Tax Pros preparer falsely reported on the Schedule C that Customer 3 operated a “District Sales Mgr” business (that being a general description of his position where he was employed) that earned \$164 but incurred \$19,207 in business expenses, including \$15,072 in car and truck expenses, \$2,510 for an office expense, \$1,010 in repairs and maintenance, and \$615 in supplies, resulting in a net business loss of \$19,043.

127. Customer 3 did not incur these business expenses and did not tell the preparer that he owned a business or incurred business expenses in 2019.

128. The Tax Pros preparer falsely reported on another Schedule C that Customer 4 operated a nursing business that earned \$156 but incurred \$18,852 in business expenses, including \$12,507 in car and truck expenses, \$1,820 for an office expense, \$4,010 in repairs and maintenance, and \$515 in supplies, resulting in a net business loss of \$18,696.

129. Customer 4 did not incur these business expenses and did not tell the preparer that she owned a business or incurred business expenses in 2019.

130. These fabricated Schedule C losses improperly reduced the reported taxable income of Customers 3 and 4 and resulted in the 2019 tax return claiming a bogus and unwarranted refund of \$6,995 which the IRS issued.

131. Tax Pros charged Customers 3 and 4 \$900 to prepare their 2019 tax return.

2020 Tax Return

132. Garner prepared the 2020 federal income tax return of Customers 3 and 4.

133. On the 2020 tax return of Customers 3 and 4, Garner falsely reported on the Schedule C that Customer 3 operated a “Testing Laboratories” business that earned \$863 but incurred \$22,618 in business expenses, including \$16,578 in car and truck expenses, \$3,456 in repairs and maintenance, and \$2,584 in utilities, resulting in a net business loss of \$21,618.

134. Customer 3 did not incur these business expenses and did not tell Garner that he owned a business or incurred business expenses in 2020.

135. Garner falsely reported on another Schedule C that Customer 4 operated a “Medical Diagnostic” business that earned \$624 but incurred \$11,137 in business expenses, all for purported car and truck expenses, resulting in a net business loss of \$10,513.

136. Customer 4 did not incur these business expenses and did not tell Garner that she owned a business or incurred any business expenses in 2020.

137. These fabricated Schedule C losses improperly reduced the reported taxable income of Customers 3 and 4 and reduced their tax owed for 2020.

2021 Tax Return

138. Garner prepared the 2021 federal income tax return of Customers 3 and 4.

139. On the 2021 tax return of Customers 3 and 4, Garner falsely reported on the Schedule C that Customer 3 operated a “Testing Laboratories” business that earned \$1,290 but incurred \$19,959 in business expenses, including \$11,099 in car and truck expenses and \$4,860 for supplies, resulting in a net business loss of \$14,669.

140. Customer 3 did not incur these business expenses and did not tell Garner that he owned a business or incurred business expenses in 2021.

141. Garner falsely reported on another Schedule C that Customer 4 operated a “Medical Diagnostic” business that earned \$1,930 but incurred \$32,382 in business expenses, including \$16,722 for car and truck expenses, \$6,700 for an office expense, and \$8,900 for supplies, resulting in a net business loss of \$30,452.

142. Customer 4 did not incur these business expenses and did not tell Garner that she owned a business or incurred any business expenses in 2021.

143. The due diligence checklist attached to the 2021 tax return falsely states that Garner asked Customers 3 and 4 questions to prepare a complete and correct Schedule C.

144. These fabricated Schedule C losses improperly reduced the reported taxable income of Customers 3 and 4 and reduced their tax owed for 2021.

145. Tax Pros charged Customers 3 and 4 \$1,282 to prepare their 2021 tax return. The invoice identifies Franklin as the business owner.

2022 Tax Return

146. A preparer at Tax Pros prepared the 2022 federal income tax return of Customers 3 and 4.

147. On the 2022 tax return, the Tax Pros preparer falsely reported on the Schedule C that Customer 4 operated a “Medical Diagnostic” business that earned \$2,257 but incurred

\$31,973 in business expenses, including \$15,836 for car and truck expenses, \$6,897 for an office expense, \$1,507 for repairs and maintenance, \$4,679 for supplies, and \$3,054 for utilities, resulting in a net business loss of \$29,716.

148. Customer 4 did not incur these business expenses and did not tell the preparer that she owned a business or incurred any business expenses in 2022.

149. The due diligence checklist attached to the 2022 tax return falsely states that the preparer asked Customer 4 questions to prepare a complete and correct Schedule C.

150. These fabricated Schedule C losses improperly reduced the reported taxable income of Customers 3 and 4 and reduced their tax owed for 2022.

151. Tax Pros charged Customers 3 and 4 \$1,282 to prepare their 2022 tax return.

152. Nobody at Tax Pros ever reviewed the completed 2018, 2019, 2020, 2021, and 2022 tax returns with Customers 3 and 4 or explained that Tax Pros reported self-employed businesses on those tax returns.

Customer 5

153. Tax Pros prepared the 2019, 2020, 2021, 2022, and 2023 federal income tax returns of Customer 5 of Hurst, Texas, at the Tax Pros offices in Haltom City, Watauga, and Hurst, Texas.

154. Customer 5 worked for a railroad and did not own or operate a business during the period that Tax Pros prepared his tax returns.

155. Garner prepared Customer 5's tax returns up until the 2022 tax return. Garner asked Customer 5 questions about expenses he had for his job, such as boots and safety equipment. Garner did not ask Customer 5 any questions about commuting mileage to and from work or whether Customer 5 used his vehicle as part of his job with the railroad.

2019 Tax Return

156. On the 2019 tax return of Customer 5, Garner falsely reported on the Schedule C that Customer 5 owned a business, not identified by name or type of business, that earned \$217 but incurred \$28,660 in business expenses, including \$17,025 in car and truck expenses, \$4,936 in supplies, and \$5,671 for utilities, resulting in a net business loss of \$28,443.

157. Customer 5 did not incur these business expenses and did not tell Garner that he owned a business or incurred business expenses in 2019.

158. This fabricated Schedule C loss improperly reduced the reported taxable income of Customer 5 and resulted in the 2019 tax return claiming a bogus and unwarranted refund of \$8,352 which the IRS issued.

2020 Tax Return

159. On the 2020 tax return of Customer 5, Garner falsely reported on the Schedule C that Customer 5 owned a “Rail Transportation” business that earned \$814 but incurred \$22,367 in business expenses, including \$17,049 in car and truck expenses, \$1,582 for repairs and maintenance, and \$1,500 for supplies, resulting in a net business loss of \$22,367.

160. Customer 5 did not incur these business expenses and did not tell Garner that he owned a business or incurred business expenses in 2020.

161. This fabricated Schedule C loss improperly reduced the reported taxable income of Customer 5 and resulted in the 2020 tax return claiming a bogus and unwarranted refund of \$6,866 which the IRS issued.

2021 Tax Return

162. On the 2021 tax return of Customer 5, Garner falsely reported on the Schedule C that Customer 5 owned a “Rail Transportation” business that earned \$988 but incurred \$27,989

in business expenses, including \$15,988 in car and truck expenses, \$3,620 in office expenses, and \$8,381 for supplies, resulting in a net business loss of \$27,989.

163. Customer 5 did not incur these business expenses and did not tell Garner that he owned a business or incurred business expenses in 2021.

164. This fabricated Schedule C loss improperly reduced the reported taxable income of Customer 5 and resulted in the 2021 tax return claiming a bogus and unwarranted refund of \$8,125 which the IRS issued.

2022 Tax Return

165. A preparer at Tax Pros prepared the 2022 federal income tax return of Customer 5.

166. On the 2022 tax return, the Tax Pros preparer falsely reported on the Schedule C that Customer 5 operated a “Rail Transportation” business that earned \$1,855 but incurred \$27,873 in business expenses, including \$19,954 in car and truck expenses, \$6,024 in supplies, \$695 for overnight travel expenses, and \$1,200 in deductible meal expenses, resulting in a net business loss of \$26,018.

167. Customer 5 did not incur these business expenses and did not tell the Tax Pros preparer that he owned a business or incurred business expenses in 2022.

168. This fabricated Schedule C loss improperly reduced the reported taxable income of Customer 5 and resulted in the 2022 tax return claiming a bogus and unwarranted refund of \$8,021 which the IRS issued.

2023 Tax Return

169. A preparer at Tax Pros prepared the 2023 federal income tax return of Customer 5.

170. On the 2023 tax return, the Tax Pros preparer falsely reported on the Schedule C that Customer 5 operated a “Rail Transportation” business that earned \$1,894 but incurred \$23,477 in business expenses, including \$19,251 in car and truck expenses and \$4,226 for utilities, resulting in a net business loss of \$21,583.

171. Customer 5 did not incur these business expenses and did not tell the Tax Pros preparer that he owned a business or incurred business expenses in 2023.

172. This fabricated Schedule C loss improperly reduced the reported taxable income of Customer 5 and resulted in the 2023 tax return claiming a bogus and unwarranted refund of \$7,081 which the IRS issued.

173. No one at Tax Pros reviewed the completed 2019, 2020, 2021, 2022, and 2023 tax returns with Customer 5, and he did not know that phony businesses and expenses were reported on his tax returns.

174. Customer 5 believes he was charged around \$700 each year to have the returns prepared. Tax Pros took the fees from his refunds.

Customer 6

175. Tax Pros prepared the 2022 and 2024 federal income tax returns of Customer 6 of Fort Worth, Texas, at the Tax Pros office in Watauga, Texas.

176. Customer 6 worked doing logistics for a railroad in 2022 and 2024, and as a bartender in 2024, for which she received a Form 1099. She did not own or operate a business in 2022 or 2024. Customer 6 was married during these years and told the Tax Pros preparers that she was married.

2022 Tax Return

177. Garner prepared the 2022 tax return of Customer 6. Although Customer 6 told Garner that she was married, Garner falsely claimed “single” filing status on the 2022 tax return.

178. Garner falsely reported on the Schedule C that Customer 6 owned a business, with the type of business classified only as “all other personal,” that earned \$634 but incurred \$11,832 in business expenses, including \$9,816 in car and truck expenses and \$2,016 for an office expense, resulting in a net business loss of \$11,198.

179. Customer 6 did not incur these business expenses and did not tell Garner that she owned a business or incurred business expenses in 2022.

180. This fabricated Schedule C loss improperly reduced the reported taxable income of Customer 6 and resulted in the 2022 tax return claiming a bogus refund of \$1,709 which the IRS issued.

2024 Tax Return

181. A preparer at Tax Pros prepared the 2024 federal income tax return of Customer 6.

182. On the 2024 tax return of Customer 6, the Tax Pros preparer falsely reported on the Schedule C that Customer 6 owned a “Drinking Places” business that earned \$3,674 (the amount she earned from her bartending job) but incurred \$10,014 in business expenses, including \$7,416 in car and truck expenses, \$648 in legal and professional services, \$617 for repairs and maintenance, \$1,069 for supplies, and \$264 for a cell phone, resulting in a net business loss of \$6,340.

183. Customer 6 did not incur these business expenses and did not tell the Tax Pros preparer that she owned a business or incurred business expenses in 2024.

184. This fabricated Schedule C loss improperly reduced the reported taxable income of Customer 6 and resulted in the 2024 tax return claiming a bogus and unwarranted refund of \$875 which the IRS issued.

185. Tax Pros charged Customer 6 around \$770 to prepare her 2024 tax return.

186. No one at Tax Pros reviewed the completed 2022 and 2024 tax returns with Customer 6, and she did not know that phony businesses and expenses were reported on her tax returns.

Customer 7

187. Franklin is identified as the preparer of the 2021 federal income tax return of Customer 7 of Azle, Texas, at the Tax Pros office in Azle, Texas.

188. Customer 7 was employed by a company doing customer service and also did accounting in 2021, for which she received a Form 1099, and did not own or operate a business.

189. Franklin falsely reported on Form Schedule C that Customer 7 owned a business, identified as “other accounting,” that earned \$1,318 but incurred \$10,355 in business expenses, including \$6,646 in car and truck expenses, \$1,324 for an office expense, \$943 for repairs and maintenance, \$462 for supplies, and \$980 for “Funeral Expenses” (a non-deductible personal expense for her husband’s funeral) resulting in a net business loss of \$9,037.

190. Customer 7 did not incur these business expenses and did not tell Franklin that she owned a business or incurred business expenses in 2021. Customer 7 informed Franklin about her husband’s death, but she did not tell Franklin that she incurred funeral expenses for a business.

191. This fabricated Schedule C loss improperly reduced the reported taxable income of Customer 7 and resulted in her 2021 tax return claiming a bogus and unwarranted refund of \$2,201 which the IRS issued.

Customer 8

192. Tax Pros prepared the 2022 and 2023 federal income tax returns of Customer 8 of Fort Worth, Texas.

193. Customer 8 was employed at a veterinary clinic in 2022 and 2023, and occasionally worked as a pet sitter for extra income outside of her job, earning around \$500 of extra income each year.

194. Customer 8 was married in 2022 and 2023 and told the preparer that she was married but that she and her husband typically file separate tax returns.

2022 Tax Return

195. A preparer at Tax Pros prepared the 2022 federal income tax return of Customer 8 at the Tax Pros office in Haltom City, Texas.

196. Although Customer 8 told the preparer that she was married, and was not entitled to claim it, the preparer falsely claimed “Head of Household” filing status on Customer 8’s 2022 tax return.

197. Customer 8’s 2022 tax return reported that Customer 8 operated a business identified as “Pet Care Except” that received \$423 in gross receipts and purportedly incurred \$5,134 in business expenses, including \$3,835 in car and truck expenses, \$487 for an office expense, and \$812 in supplies, resulting in a phony business loss of \$4,711.

198. Customer 8 did not incur these business expenses and did not tell anyone at Tax Pros that she incurred these expenses in 2022.

199. As a result of the phony filing status and fabricated business loss, Customer 8's 2022 tax return claimed a falsely inflated EITC in the amount of \$5,544 and a bogus and unwarranted refund in the amount of \$10,089 which the IRS issued.

2023 Tax Return

200. A preparer at Tax Pros prepared the 2023 federal income tax return of Customer 8 at the Tax Pros office in North Richland Hills, Texas.

201. Although Customer 8 told the preparer that she was married, and was not entitled to claim it, the preparer falsely claimed "Head of Household" filing status on Customer 8's 2023 tax return.

202. The 2023 tax return reported that Customer 8 operated a business identified as "Pet Care Except" that received gross receipts of \$614 and purportedly incurred \$4,277 in business expenses, including \$404 for car and truck expenses, \$2,771 in office expenses, \$717 for supplies, and \$385 in deductible meals, resulting in a phony business loss of \$3,663.

203. Customer 8 did not incur these business expenses and did not tell anyone at Tax Pros that she incurred these expenses in 2023.

204. As a result of the phony filing status and fabricated business loss, Customer 8's 2023 tax return claimed a falsely inflated EITC in the amount of \$2,858 and a bogus and unwarranted refund in the amount of \$6,929 which the IRS issued.

Customer 9

205. A preparer at Tax Pros prepared the 2023 federal income tax return of Customer 9 of Fort Worth, Texas at the Tax Pros office in Hurst, Texas, for a fee of around \$1,300 or \$1,400.

206. Customer 9 worked for an aerospace company in 2023 and did not own or operate a business.

207. The 2023 tax return falsely reported that Customer 9 operated a business, and that Customer 9 incurred \$29,020 in business expenses, including \$19,630 in car and truck expenses, \$3,828 in repairs and maintenance, and \$3,946 in utilities, resulting in a phony business loss of \$27,773.

208. Customer 9 did not incur these business expenses and did not tell anyone at Tax Pros that he owned a business or incurred business expenses in 2023. Customer 9 only provided the preparer with a copy of his Form W-2. The preparer did not review the completed tax return with Customer 9.

209. This fabricated Schedule C improperly reduced the reported tax liability of Customer 9 for 2023.

Customer 10

210. Tax Pros prepared the 2022 and 2023 federal income tax returns of Customer 10 of Fort Worth, Texas at the Tax Pros office in Hurst, Texas.

211. Customer 10 did not own or operate a business in 2022 or 2023 and did not tell the preparer that she owned or operated a business.

2022 Tax Return

212. A preparer at Tax Pros prepared the 2022 federal income tax return of Customer 10.

213. Customer 10 earned \$68,655 through her employment in 2022.

214. The 2022 tax return falsely reported that Customer 10 operated a “financial” business that received \$1,054 in gross receipts, and incurred \$17,902 in business expenses, including \$10,314 in car and truck expenses, \$3,012 in supplies, and \$2,165 in phone and internet expenses, resulting in a phony business loss of \$16,848.

215. Customer 10 did not incur these business expenses and did not tell anyone at Tax Pros that she owned a business or incurred business expenses in 2022.

216. As a result of the fabricated business loss in the amount of \$16,848, Customer 10's 2022 tax return claimed a bogus and unwarranted refund in the amount of \$4,304 which the IRS issued.

2023 Tax Return

217. A preparer at Tax Pros prepared the 2023 federal income tax return of Customer 10.

218. Customer 10 earned \$82,990 through her employment in 2023.

219. The 2023 tax return falsely reported that Customer 10 operated a "financial" business that received \$1,254 in gross receipts, incurred \$23,969 in business expenses, including \$14,534 in car and truck expenses, \$3,819 in supplies, and \$2,204 in cell phone and internet expenses, resulting in a phony business loss of \$22,715.

220. Customer 10 did not incur these business expenses and did not tell anyone at Tax Pros that she owned a business or incurred business expenses in 2023.

221. As a result of the fabricated business loss in the amount of \$22,715, Customer 10's 2023 tax return claimed a bogus and unwarranted refund in the amount of \$4,565 which the IRS issued.

222. Tax Pros charged Customer 10 over \$900 to prepare her 2023 tax return after Customer 10 complained about an even higher fee initially being quoted.

223. Customer 10 does not believe that she received a copy of her completed tax return.

Customer 11

224. Tax Pros prepared the 2022 and 2023 federal income tax returns of Customer 11 of Fort Worth, Texas at the Tax Pros office in Haltom City, Texas.

225. Customer 11 did not own or operate a business in 2022 or 2023 and did not tell the preparer that he owned or operated a business. The preparer did not ask Customer 11 any questions about owning a business but asked him how far he drove to and from his job and whether he used his cell phone as part of his job.

2022 Tax Return

226. A preparer at Tax Pros prepared the 2022 federal income tax return of Customer 11.

227. Customer 11 earned \$68,156 through his employment in 2022. The 2022 tax return falsely reported that Customer 11 operated a “special food” business that received \$209 in gross receipts, and incurred \$18,476 in business expenses, including \$14,800 in car and truck expenses, \$1,522 in supplies, \$963 for travel, \$86 for deductible meals, \$211 for repairs and maintenance, and \$786 in utilities, resulting in a phony business loss of \$18,267.

228. Customer 11 did not incur these business expenses and did not tell anyone at Tax Pros that he owned a business or incurred business expenses in 2022.

229. As a result of the fabricated business loss in the amount of \$18,267, Customer 11’s 2022 tax return claimed a bogus and unwarranted refund in the amount of \$4,482 which the IRS issued.

2023 Tax Return

230. A preparer at Tax Pros prepared the 2023 federal income tax return of Customer 11.

231. Customer 11 earned \$74,127 through his employment in 2023. The 2023 tax return falsely reported that Customer 11 operated a “special food” business that received \$581 in gross income and incurred \$20,267 in business expenses, including \$2,059 in car and truck expenses, \$281 for commissions and fees, \$3,218 in repairs and maintenance, \$602 for supplies, \$684 for taxes and licenses, \$4,402 for travel, and \$9,021 in utilities, resulting in a phony business loss of \$19,686.

232. Customer 11 did not incur these business expenses and did not tell anyone at Tax Pros that he owned a business or incurred business expenses in 2023.

233. As a result of the fabricated business loss in the amount of \$19,686, Customer 11’s 2022 tax return claimed a bogus and unwarranted refund in the amount of \$4,866 which the IRS issued.

234. Tax Pros charged Customer 11 around \$800 to prepare his 2023 tax return.

Customers 12 and 13

235. Tax Pros prepared the 2022 and 2023 federal income tax returns of Customers 12 and 13 of Fort Worth, Texas.

236. Neither Customer 12 nor Customer 13 owned or operated a business in 2022 or 2023 and they did not tell the preparers that they owned or operated a business.

2022 Tax Return

237. A preparer at Tax Pros prepared the 2022 federal income tax return of Customers 12 and 13 at the Tax Pros office in North Richland Hills, Texas.

238. Combined, Customers 12 and 13 received \$43,146 in wages from their jobs in 2022.

239. The 2022 tax return falsely reported that Customer 13 operated a “warehouse” business that received \$477 in gross receipts and incurred \$10,599 in business expenses, all in the form of car and truck expenses, resulting in a phony business loss of \$10,122.

240. Customer 13 did not incur these business expenses and neither Customer 12 nor Customer 13 told anyone at Tax Pros that Customer 13 owned a business or incurred business expenses in 2022.

241. As a result of the fabricated business loss in the amount of \$10,122, the 2022 tax return of Customers 12 and 13 claimed a falsely inflated EITC in the amount of \$2,652 and a bogus and unwarranted refund in the amount of \$8,529 which the IRS issued.

2023 Tax Return

242. A preparer at Tax Pros prepared the 2023 federal income tax return of Customers 12 and 13 at the Tax Pros office in Hurst, Texas.

243. Combined, Customers 12 and 13 received a total of \$79,362 in wages from their jobs in 2023. Customer 13 worked at two jobs in 2013. However, the preparer told Customer 12 that Customers 12 and 13 would receive a larger refund if the preparer did not report all of Customer 13’s income. The preparer then did not report the income reflected on one of Customer 13’s Forms W-2, only reporting wage income totaling \$55,602 on the tax return.

244. The 2023 tax return falsely reported that Customer 13 operated a “warehousing” business that received gross income in the amount of \$1,367 and incurred \$14,465 in business expenses, including \$4,764 in car and truck expenses, \$5,045 to rent or lease business property, \$1,983 for travel, and \$2,673 in utilities, resulting in a phony business loss of \$13,098.

245. Customer 13 did not incur these business expenses and neither Customer 12 nor Customer 13 told anyone at Tax Pros that Customer 13 owned a business or incurred business expenses in 2023.

246. As a result of the fabricated business loss in the amount of \$13,098, and the Tax Pros preparer's failure to report over \$23,000 in income, the 2023 tax return of Customers 12 and 13 claimed a falsely inflated EITC in the amount of \$1,693, resulting in a bogus and unwarranted refund in the amount of \$7,456 which the IRS issued.

247. Tax Pros charged Customers 12 and 13 over \$1,000 to prepare each of these tax returns.

Customer 14

248. A tax preparer at Tax Pros prepared the 2022 and 2023 federal income tax returns of Customer 14 of Fort Worth, Texas at the Tax Pros office in Haltom City, Texas.

249. Customer 14 did not own or operate a business in 2022 or 2023 and did not tell the preparer that he owned or operated a business. The preparer did not ask Customer 14 any questions about owning a business.

2022 Tax Return

250. In 2022, Customer 14 received \$47,211 in wages through his employment. Customer 14 gave a copy of his Form W-2 to the preparer.

251. The 2022 tax return falsely reported that Customer 14 owned or operated a "support" business that received \$361 in gross receipts, and incurred \$17,482 in business expenses, including \$16,141 in car and truck expenses, \$1,099 in utilities, and \$242 in deductible meals, resulting in a phony business loss of \$17,121.

252. Customer 14 did not incur these business expenses and did not tell anyone at Tax Pros that in 2022 he owned a business or incurred business expenses. Customer 14 did not know that his 2022 tax return falsely reported that he owned a business.

253. As a result of the fabricated business loss in the amount of \$17,121, Customer 14's 2022 tax return claimed a bogus and unwarranted refund in the amount of \$2,734 which the IRS issued.

2023 Tax Return

254. In 2023, Customer 14 received \$49,820 through his employment. Customer 14 gave a copy of his Forms W-2 and 1099 to the preparer.

255. The 2023 tax return falsely reported that Customer 14 operated a "support" business and that Customer 14 incurred \$18,576 in business expenses, all in the form of car and truck expenses, resulting in a phony business loss of \$13,347.

256. Customer 14 did not incur these business expenses and did not tell anyone at Tax Pros that he had a business or business expenses in 2023. Customer 14 did not know that his 2023 tax return falsely reported that he owned a business.

257. As a result of the fabricated business loss in the amount of \$13,347, Customer 14's 2023 tax return claimed a bogus and unwarranted refund in the amount of \$2,376 which the IRS issued.

258. The Tax Pros preparer told Customer 14 that the tax preparation fee was around \$700 or \$800, and that the fee would be taken from his tax refund. But based on the amount of the refund that Customer 14 received, the actual fees Tax Pros charged may have totaled over \$1,000.

Customers 15 and 16

259. A preparer at Tax Pros prepared the 2022 and 2023 federal income tax returns of Customers 15 and 16 of Fort Worth, Texas. The tax returns are identified as prepared at the Tax Pros office in Azle, Texas.

260. In 2022 and 2023, Customer 15 was employed doing bookkeeping for a church, and Customer 16 worked as a marketing manager. Customers 15 and 16 did not have their tax returns prepared in person, but emailed their Forms W-2, copies of their driver's licenses, and copies of their social security cards for themselves and their children to the preparer. The preparer also asked questions by email about any expenses that Customers 15 and 16 incurred for their jobs, but did not ask any questions about Customers 15 and 16 owning a business. Neither Customer 15 nor Customer 16 owned a business in 2022 or 2023.

261. Customers 15 and 16 did not receive copies of their completed 2022 and 2023 tax returns.

2022 Tax Return

262. The 2022 tax return falsely reported that Customer 16 operated a "management" business that earned \$1,271 in gross receipts and that incurred \$16,232 in business expenses, including \$9,680 in car and truck expenses, \$2,436 in commissions and fees, \$2,004 on office expenses, and \$2,112 in insurance, resulting in a phony business loss of \$14,961.

263. Customer 16 did not incur these business expenses and neither Customer 15 nor Customer 16 told anyone at Tax Pros that Customer 16 owned a business or incurred business expenses in 2022.

264. This fabricated Schedule C and bogus business loss improperly reduced the reported tax liability of Customers 15 and 16 for 2022.

2023 Tax Return

265. The 2023 tax return falsely reported that Customer 16 operated a management business, and that Customer 16 received \$3,173 in gross receipts but incurred \$24,274 in business expenses, including \$13,433 in car and truck expenses, \$2,748 in commissions and fees, \$787 for supplies, and \$4,797 in travel expenses, resulting in a phony business loss of \$21,101.

266. Customer 16 did not incur these business expenses and neither Customer 15 nor Customer 16 told anyone at Tax Pros that Customer 16 owned a business or incurred business expenses in 2023.

267. This fabricated Schedule C and bogus business loss improperly reduced the reported tax liability of Customers 15 and 16 for 2023.

Customer 17

268. A preparer at Tax Pros prepared the 2023 federal income tax return of Customer 17 of Fort Worth, Texas at the Tax Pros office in Hurst, Texas.

269. Customer 17 did not own or operate a business in 2023 and did not tell the preparer that she owned or operated a business. Customer 17 earned \$34,143 through her employment in 2023.

270. The 2023 tax return falsely reported that Customer 17 operated a janitorial services business that received \$749 in gross receipts and incurred \$10,294 in business expenses, all in the form of car and truck expenses, resulting in a phony business loss of \$9,545.

271. Customer 17 did not incur these business expenses and did not tell anyone at Tax Pros that she owned a business or incurred business expenses in 2023.

272. As a result of the fabricated business loss in the amount of \$9,545, Customer 17's 2023 tax return claimed a bogus and unwarranted refund in the amount of \$1,220 which the IRS issued.

273. The Tax Pros preparer provided Customer 17 with a copy of the completed tax return but did not review it with Customer 17 or tell Customer 17 that it falsely reported that she owned a business. The preparer only told Customer 17 that the fee to prepare the return was around \$800.

Customers 18 and 19

274. A preparer at Tax Pros prepared the 2023 federal income tax return of Customers 18 and 19 of Fort Worth, Texas. Customers 18 and 19 only communicated with the preparer by email or text message, but the return is identified as prepared at the Tax Pros office in North Richland Hills, Texas.

275. Customer 18 provided the preparer with Forms W-2, property tax records, 401k withdrawal documentation, unemployment income documentation, social security cards, and ID cards. Neither Customer 18 nor Customer 19 owned or operated a business in 2023 and they did not tell the preparer that they owned or operated a business. The preparer did not ask if either Customer 18 or 19 owned a business. The preparer asked Customer 18 to provide records showing vehicle mileage, car repair or maintenance expenses, phone expenses, and job-related expenses, but Customer 18 told the preparer that she did not have any such records.

276. The 2023 tax return falsely reported that Customer 19 operated a janitorial services business that received \$2,400 in gross receipts and incurred \$15,535 in business expenses, all in the form of car and truck expenses, and \$1,857 in office expenses resulting in a phony business loss of \$13,135.

277. Customer 19 did not incur these business expenses and neither Customer 18 nor Customer 19 told anyone at Tax Pros that Customer 19 owned a business or incurred business expenses in 2023. The preparer did not tell Customer 18 or 19 that she reported on the return that Customer 19 owned a business.

278. As a result of the fabricated business loss in the amount of \$13,135, the 2023 tax return of Customers 18 and 19 claimed a bogus and unwarranted refund in the amount of \$1,338 which the IRS issued.

Customer 20

279. Tax Pros prepared the 2019 and 2020 federal income tax returns of Customer 20 of Dallas, Texas, at the Tax Pros offices in Haltom City and Azle, Texas.

280. Customer 20 worked through a temp agency and did not own or operate a business in 2019 or 2020. Customer 20 was married during these years and told Ritter and Franklin that he was married, but that he normally files separately from his wife.

281. No one at Tax Pros reviewed the completed tax returns with Customer 20, and he did not know that phony claims were reported on his tax returns.

2019 Tax Return

282. Ritter prepared the 2019 tax return of Customer 20. Although Customer 20 told Ritter that he was married, and was not entitled to claim it, Ritter falsely claimed “Head of Household” filing status on the 2019 tax return.

283. On the 2019 tax return, Ritter falsely reported on the Schedule C that Customer 20 owned a business, not identified by name or type of business, that earned \$841 but incurred \$15,460 in business expenses, including \$13,807 in car and truck expenses and \$1,653 for supplies, resulting in a net business loss of \$14,619.

284. Customer 20 did not incur these business expenses and did not tell Ritter that he owned a business or incurred business expenses in 2019.

285. The fabricated Schedule C loss and false filing status improperly reduced the reported taxable income of Customer 20 and resulted in the 2019 tax return claiming a bogus and unwarranted refund of \$3,093 which the IRS issued.

2020 Tax Return

286. Franklin prepared the 2020 tax return of Customer 20. Although Customer 20 told Franklin that he was married, and was not entitled to claim it, Franklin falsely claimed “Head of Household” filing status on the 2020 tax return.

287. On the 2020 tax return of Customer 20, Franklin falsely reported on the Schedule C that Customer 20 owned an “employment services” business that earned \$1,452 but incurred \$8,891 in business expenses, all in the form of car and truck expenses, resulting in a net business loss of \$7,439.

288. Customer 20 did not incur these business expenses and did not tell Franklin that he owned a business or incurred business expenses in 2020.

289. Customer 20 attended community college in 2020 and his tuition expenses, reported to the IRS on a Form 1098-T, totaled \$177. Franklin falsely claimed on the tax return that Customer 20 incurred \$3,520 in qualified education expenses and claimed a bogus American opportunity education credit in the amount of \$952.

290. This fabricated Schedule C loss, false filing status claimed, and falsely inflated education credit improperly reduced the reported taxable income of Customer 20 and resulted in his 2020 tax return claiming a bogus and unwarranted refund of \$5,499 which the IRS issued.

Customer 21

291. Ritter prepared the 2020, 2021, 2022, and 2023 federal income tax returns of Customer 21 of Fort Worth, Texas. Ritter is not identified as the paid preparer on any of these tax returns.

292. Beginning in 2020, Customer 21 sold jewelry out of her home (often to friends and family), although she considered it to be more of a hobby than a business. Customer 21 spent more on the jewelry the first year or two than she did as the business went on, because it was more of a hobby, and she was no longer having fun doing it.

293. To the extent that Customer 21 incurred expenses related to her hobby (that is improperly characterized as a business on her tax returns), Ritter inflated or fabricated the related expenses claimed on Customer 21's tax returns.

2021 Tax Return

294. On the 2021 tax return of Customer 21 (which identifies Garner as the preparer, although Ritter prepared it), Ritter falsely reported on the Schedule C that Customer 21 received \$8,282 selling jewelry, but incurred expenses totaling \$22,127, including \$11,858 on supplies, resulting in a net loss of \$13,845.

295. Ritter also claimed a bogus COVID-19 credit on Customer 21's 2021 tax return. While Ritter reported on the Schedule C that Customer 21 lost \$13,845 through a business, on the Form 7202 attached to the tax return, used to calculate a COVID-19 credit, Ritter falsely reported that Customer 21 had net *earnings* (not a loss) from a business totaling \$4,000. As a result of this false claim, Ritter claimed a bogus COVID-19 credit in the amount of \$250.

296. The fabricated Schedule C loss and COVID-19 credit improperly reduced the reported taxable income of Customer 21 and resulted in the 2021 tax return claiming a bogus and unwarranted refund of \$5,704 which the IRS issued.

2022 Tax Return

297. On the 2022 tax return, Ritter falsely reported on the Schedule C that Customer 21 earned \$6,413 selling jewelry but incurred \$31,658 in business expenses, including \$20,565 in car and truck expenses, \$4,424 for an office expense, \$320 for repairs and maintenance, and \$6,349 for supplies, resulting in a net business loss of \$25,245.

298. Customer 21 did not incur these business expenses in these amounts and did not tell Ritter that she incurred these expenses in 2022.

299. This fabricated Schedule C loss improperly reduced the reported taxable income of Customer 21 and resulted in the 2022 tax return claiming a bogus and unwarranted refund of \$2,565 which the IRS issued.

2023 Tax Return

300. On the 2023 tax return, Ritter falsely reported on the Schedule C that Customer 21 earned \$1,650 selling jewelry but incurred \$22,822 in business expenses, including \$16,505 in car and truck expenses, \$3,415 for an office expense, and \$2,562 for supplies, resulting in a net business loss of \$21,172.

301. Customer 21 did not incur these business expenses in these amounts and did not tell Ritter that she incurred these expenses in 2023.

302. This fabricated Schedule C loss improperly reduced the reported taxable income of Customer 21 and resulted in the 2023 tax return claiming a bogus and unwarranted refund of \$781 which the IRS issued.

303. Ritter did not review the completed tax returns with Customer 21, and she did not know that false information was reported on her tax returns.

Harm

304. The false returns that the Defendants and their tax preparation business prepare and file have caused – and continue to cause – substantial harm to the public and the United States Treasury by falsely reducing their customers’ reported tax liabilities, causing customers not to pay taxes they lawfully owe and/or to receive bogus tax refunds they are not entitled to receive.

305. The Defendants’ customers have been harmed because they relied on the Defendants and their tax preparation business to prepare proper tax returns. Instead, customers’ tax returns substantially understated their correct tax liabilities after paying unconscionably high fees to have their tax returns prepared. As a result, the Defendants’ customers, many of whom are lower-income taxpayers, may face large income tax assessments if audited and may be liable for penalties and interest.

306. Customers are harmed by the high and frequently undisclosed fees tied to anticipated tax refunds. These fees usually are subtracted from the bogus refunds that result from the false or fraudulent tax return preparation perpetrated by the Defendants and those acting at their direction or with their knowledge and consent. When the IRS conducts audits or examinations of customers and seeks repayment of these unwarranted refunds, the customers are liable for the repayment of those refunds. Not only do customers face the hardship associated with repayment of bogus refunds resulting from the Defendants’ greed at others’ expense, but customers also may have to repay the portion of the refund that the Defendants subtracted in fees. Customers also may have to pay additional fees to other tax return preparers to file

amended tax returns to correct the false or fraudulent information included on their tax returns by the Defendants and those acting at their direction or with their knowledge and consent.

307. The Defendants' misconduct further harms the United States and the public by requiring the IRS to devote some of its limited resources to detecting their false claims on tax returns and assessing and collecting lost tax revenues from the Defendants' customers. Consequently, identifying and recovering all lost tax revenues resulting from the Defendants' wrongdoing may be impossible.

308. In addition to the direct harm the Defendants cause by preparing tax returns that understate their customers' tax liabilities, the Defendants' conduct undermines the public's compliance with the internal revenue laws.

309. The Defendants' unlawful conduct also harms honest tax return preparers because, by preparing tax returns that unlawfully inflate their customers' refunds, the Defendants gain an unfair competitive advantage over tax return preparers who prepare tax returns in accordance with the law. Customers who are satisfied with the tax refunds that they receive—but who often are unaware of the Defendants' illegal tax return preparation practices—return to the Defendants for subsequent tax return preparation.

310. The IRS estimates the tax harm caused by the Defendants' activities exceeds \$17 million in total for filing seasons 2023 and 2024 alone, in the form of tax that was not properly reported and collected and/or refunds that were improperly issued.

311. The harm to the Government and the public will increase if the Defendants are not enjoined because – given the seriousness and pervasiveness of their improper conduct – without an injunction, they are likely to continue preparing false and fraudulent tax returns. In sum, an

injunction will serve the public interest because it will put a stop to the Defendants' misconduct and the harm such conduct causes the United States and the public.

**COUNT I: Injunction under 26 U.S.C. § 7407
for Conduct Subject to Penalty under 26 U.S.C. §§ 6694 and 6695
and Deceptive or Fraudulent Conduct that Interferes with Internal Revenue Code**

312. The United States incorporates by reference the allegations in paragraphs 5 to 311 as though fully set forth herein.

313. Under 26 U.S.C. § 7407, a court is authorized to enjoin a tax return preparer who, among other things, engages in conduct subject to penalty under 26 U.S.C. §§ 6694 or 6695, or who engages in any other fraudulent or deceptive conduct that substantially interferes with the proper administration of the internal revenue laws. Additionally, if the court finds that a preparer has continually or repeatedly engaged in such conduct, and the court further finds that a narrower injunction (i.e., prohibiting only that specific conduct) would not be sufficient to prevent that person's interference with the proper administration of the internal revenue laws, the court may enjoin the person from further acting as a tax return preparer altogether. The prohibited conduct justifying an injunction includes, among other things, the following:

- a. Engaging in conduct subject to penalty under 26 U.S.C. § 6694(a), which penalizes a return preparer who prepares a return or claim for refund that contains an unreasonable position and the return preparer knew (or reasonably should have known) of the position;
- b. Engaging in conduct subject to penalty under 26 U.S.C. § 6694(b), which penalizes a return preparer who, among other proscribed conduct, recklessly or intentionally disregards IRS rules or regulations;
- c. Engaging in conduct subject to penalty under 26 U.S.C. § 6695(b), which penalizes a tax return preparer who fails to identify himself or herself on a tax return that he or she prepares;
- d. Engaging in conduct subject to penalty under 26 U.S.C. § 6695(g), which penalizes a return preparer who fails to comply with statutory due diligence requirements; or

- e. Engaging in any other fraudulent or deceptive conduct that substantially interferes with the proper administration of the internal revenue laws.

314. Section 7701(a)(36) of the Internal Revenue Code defines tax return preparer to include not only the individual who personally prepares a tax return for compensation, but also anyone “who employs one or more persons” to prepare tax returns for compensation.

315. The Defendants are tax return preparers who have repeatedly and continually prepared or submitted returns or portions of returns (or employed or managed others who prepared or submitted returns or portions of returns) that contain unreasonable positions and substantially understate the liability for tax on the return.

316. Defendants have repeatedly engaged in conduct subject to penalty under 26 U.S.C. §§ 6694 and 6695 and have engaged in other fraudulent and deceptive conduct which substantially interferes with the proper administration of the Internal Revenue laws.

317. Injunctive relief is appropriate to prevent the recurrence of such conduct.

318. Anything less than a permanent injunction and complete bar on the preparation of tax returns is unlikely to stop the Defendants from continuing to violate 26 U.S.C. §§ 6694 and 6695 and from continuing to substantially interfere with the proper administration of the internal revenue laws.

Violations of 26 U.S.C. § 6694(a)

319. Section 6694(a) penalizes a tax return preparer if: (1) the preparer prepared a return or claim for refund that included an understatement of liability due to a position for which there was not a realistic possibility of being sustained on the merits; (2) the preparer knew (or reasonably should have known) of such position; and (3) the position was not properly disclosed or was frivolous.

320. Section 6694(e) defines understatement of liability to include any understatement of tax due or “overstatement of the net amount creditable or refundable.”

321. In violation of 26 U.S.C. § 6694(a), the Defendants prepared tax returns for customers that understated the customers’ tax liabilities and/or overstated the net amount of tax creditable or refundable, and that they knew or should have known contained positions for which there was no substantial authority or for which there was no reasonable basis.

322. In violation of section 6694(a), the Defendants prepared tax returns for customers that they knew or reasonably should have known contained fictitious Schedule C income and/or losses that the taxpayers did not incur.

Violations of 26 U.S.C. § 6694(b)

323. Section 6694(b) penalizes a tax return preparer who prepares a return or claim with an understatement of liability: (1) in a willful attempt to understate the liability; or (2) with a reckless and intentional disregard of rules or regulations.

324. In violation of 26 U.S.C. § 6694(b), the Defendants recklessly or intentionally disregarded rules and/or regulations by preparing and filing tax returns that contained fictitious Schedule C losses that the taxpayers did not incur.

Violations of 26 U.S.C. § 6695

325. The Treasury regulations promulgated under 26 U.S.C. § 6695(g) prohibit a return preparer from claiming head of household filing status, the EITC, and other credits without first conducting proper due diligence and documenting his or her compliance with the due diligence requirements. *See* 26 C.F.R. § 1.6695-2 (2011). Not only do the Defendants fail to conduct proper due diligence or comply with the due diligence documentation requirements, but they also advise, encourage, assist, and/or cause others acting with their knowledge or consent to

circumvent the due diligence requirements and to ignore or disregard the information provided by customers. Thus, the Defendants, and those acting at their direction or with their knowledge or consent, violate 26 U.S.C. § 6695(g).

326. Section 6695(b) penalizes a tax return preparer who fails to sign a tax return that he or she prepares, and section 6695(c) penalizes a tax return preparer, or employer of a tax return preparer, who fails to report an identifying number of the tax return preparer or their employer on a tax return that the preparer or their employee prepares.

327. The Defendants, and those acting at their direction or with their knowledge or consent, fail to properly identify the actual paid preparer of the tax returns that they prepare, in violation of 26 U.S.C. §§ 6695(b) and 6695(c).

Fraudulent or Deceptive Conduct that Interferences with Internal Revenue Laws

328. The Defendants engage in fraudulent and deceptive conduct that substantially interferes with the proper administration of the internal revenue laws when they prepare and file tax returns for customers that contain fictitious Schedule C income and/or expenses that the taxpayers did not incur, claim bogus credits, claim fabricated EITCs, fail to conduct required “due diligence,” and conceal the actual paid preparers of the tax returns.

**COUNT II: Injunction under 26 U.S.C. § 7408
for Conduct Subject to Penalty under 26 U.S.C. § 6701**

329. The United States incorporates by reference the allegations in paragraphs 5 to 311, as though fully set forth herein.

330. Section 7408 of the Internal Revenue Code authorizes a district court to enjoin any person from engaging in conduct subject to penalty under 26 U.S.C. § 6701 (among other provisions) if injunctive relief is appropriate to prevent the recurrence of such conduct.

331. Section 6701 of the Internal Revenue Code imposes a penalty on any person who aids or assists in the preparation or presentation of a federal tax return knowing (or having reason to believe) that the filed return would result in an understatement of the tax liability.

332. The Defendants, and those acting at their direction or with their knowledge or consent, prepare federal tax returns for their customers knowing (or having reason to believe) they would be filed with the IRS and knowing the returns understate the customers' tax liabilities. The Defendants know the returns understate the customers' tax liabilities because the returns claim fictitious income and/or expenses and claim bogus credits, including phony EITC claims. Thus, the Defendants' conduct is subject to penalty under § 6701.

333. If the Court does not enjoin the Defendants, they are likely to continue to engage in conduct subject to penalty under § 6701. The Defendants' conduct has continued for several years, for many different customers, and involves multiple and evolving schemes.

334. Injunctive relief is appropriate to prevent recurrence of such conduct.

COUNT III: Injunction under 26 U.S.C. § 7402(a)
Necessary to Enforce the Internal Revenue Laws

335. The United States incorporates by reference the allegations in paragraphs 5 to 311, as though fully set forth herein.

336. Under 26 U.S.C. § 7402(a), a court is authorized to issue orders of injunction as may be necessary or appropriate to enforce the internal revenue laws.

337. 26 U.S.C. § 7402(a) expressly provides that its injunction remedy is "in addition to and not exclusive of" other remedies for enforcing the internal revenue laws.

338. The Defendants' activities substantially interfere with the enforcement of the internal revenue laws because the Defendants cause thousands of false or fraudulent tax returns

to be filed, which result in customers not paying their true federal tax liabilities and receiving tax refunds to which they are not entitled.

339. The Defendants have shown that they should not be allowed to continue to prepare any tax returns for others because they have deliberately employed an illegal scheme, including claiming fabricated businesses and business income and/or expenses on Schedules C and making bogus claims for fabricated or falsely inflated EITCs, that is designed to understate taxable income and claim fraudulent tax refunds while evading detection by the IRS. Moreover, the IRS lacks the resources to audit every return that the Defendants and those acting at their direction or with their knowledge and consent prepare. The Defendants are actively subverting the United States' tax system, which relies on taxpayers to self-report their income and expenses fully and accurately.

340. An injunction prohibiting the Defendants from preparing or assisting in the preparation of tax returns for others is necessary and appropriate to stop them from preparing and filing false or fraudulent tax returns and to prohibit them from otherwise interfering with the proper administration and enforcement of the internal revenue laws.

341. If the Defendants are not enjoined, the United States will suffer irreparable harm for which it has no adequate remedy at law because it will wrongfully issue federal income tax refunds to individuals not entitled to receive them, will collect less than the correct amount of tax from individuals who owe taxes to the United States, and will be unable to fully recoup the resulting losses to the U.S. Treasury. This irreparable harm far outweighs any potential hardship to the Defendants by requiring them to follow the law and barring them from preparing tax returns for compensation.

342. The public interest would be advanced by enjoining the Defendants because an injunction, backed by the Court's contempt powers if needed, will stop their illegal conduct and the harm their conduct is causing the United States Treasury and the public.

343. Because no adequate remedy of law is available to prevent further irreparable harm to the United States by the Defendants, an injunction under 26 U.S.C. § 7402 is necessary and appropriate.

COUNT IV: Disgorgement Under 26 U.S.C. § 7402

344. The United States incorporates by reference the allegations in paragraphs 5 to 311, as though fully set forth herein.

345. Section 7402 of the Internal Revenue Code authorizes a district court to issue orders, judgments, and decrees as may be necessary or appropriate for the enforcement of the internal revenue laws. Under 26 U.S.C. § 7402, a court may issue a broad range of remedies, including disgorgement of ill-gotten gains.

346. The Defendants' conduct substantially interferes with the enforcement of the internal revenue laws and has caused the United States to issue tax refunds to individuals not entitled to receive them. The Defendants have unjustly profited at the expense of the United States by subtracting their fees from those refunds. The Defendants received ill-gotten gains by charging fees for the preparation and filing of false or fraudulent tax returns, including tax returns that fabricate income and/or expenses (primarily on Forms Schedule C) to illegally reduce the customer's reported adjusted gross income, claim bogus filing statuses, claim phony credits (including education credits), and, in many cases, claim a bogus or falsely inflated EITC. Disgorgement of these fees charged by the Defendants is therefore necessary and appropriate under 26 U.S.C. § 7402(a).

347. The Defendants are not entitled to these ill-gotten gains. But for their misconduct, these improper refunds would not have been issued.

348. Disgorgement here serves the remedial purpose of depriving the Defendants of their ill-gotten gains and returning those ill-gotten gains to the source from which they were wrongfully obtained.

349. The Court should enter an order under 26 U.S.C. § 7402(a) requiring the Defendants to disgorge to the United States the fees they collected (taken from refunds issued by the Treasury) for the preparation of federal tax returns that make false and/or fraudulent claims and/or related to other misconduct that interferes with the enforcement of the internal revenue laws, including failing to identify themselves of the paid preparer of tax returns that they prepare and failing to comply with IRS due diligence requirements.

WHEREFORE, the United States of America prays for the following:

A. That the Court find that Amberley Ritter, Wesley Franklin, Mark Burkart, Kenneth Garner, and DFW Integrity Taxpros Services, LLC have continually and repeatedly engaged in conduct subject to penalty under 26 U.S.C. §§ 6694 and 6695, and in other fraudulent or deceptive conduct that substantially interferes with the proper administration of the tax laws; that injunctive relief is appropriate to prevent the recurrence of such conduct; that an injunction merely prohibiting conduct subject to penalty under 26 U.S.C. §§ 6694 or 6695, or other fraudulent or deceptive conduct, would be insufficient to prevent their interference with the proper administration of the tax laws; and that Amberley Ritter, Wesley Franklin, Mark Burkart, Kenneth Garner, and DFW Integrity Taxpros Services, LLC should be permanently enjoined from acting as tax return preparers under 26 U.S.C. § 7407;

B. That the Court find that Amberley Ritter, Wesley Franklin, Mark Burkart,

Kenneth Garner, and DFW Integrity Taxpros Services, LLC have repeatedly engaged in conduct subject to penalty under 26 U.S.C. § 6701; that injunctive relief is appropriate to prevent recurrence of such conduct; and that Amberley Ritter, Wesley Franklin, Mark Burkart, Kenneth Garner, and DFW Integrity Taxpros Services, LLC should be permanently enjoined under 26 U.S.C. § 7408;

C. That the Court find that Amberley Ritter, Wesley Franklin, Mark Burkart, Kenneth Garner, and DFW Integrity Taxpros Services, LLC have interfered with the enforcement of the internal revenue laws; that injunctive relief is necessary and appropriate to prevent the recurrence of that conduct; and that Amberley Ritter, Wesley Franklin, Mark Burkart, Kenneth Garner, and DFW Integrity Taxpros Services, LLC should be permanently enjoined under 26 U.S.C. § 7402(a);

D. That the Court, pursuant to 26 U.S.C. §§ 7402(a), 7407, and 7408 enter a permanent injunction enjoining Amberley Ritter, Wesley Franklin, Mark Burkart, Kenneth Garner, and DFW Integrity Taxpros Services, LLC, and all those in active concert or participation with them, from directly or indirectly:

- (1) acting as federal tax return preparers or requesting, assisting in, or directing, the preparation or filing of any federal tax returns, amended returns, or other related documents or forms for any person or entity other than themselves;
- (2) preparing or assisting in preparing federal tax returns that they know or reasonably should know would result in an understatement of tax liability or the overstatement of federal tax refund(s) as penalized by 26 U.S.C. § 6694;
- (3) owning, operating, managing, working for, investing in, volunteering for, consulting for, providing capital or loans to, receiving fees or remuneration from, controlling, licensing, consulting with, or franchising a tax return preparation business;
- (4) training, instructing, teaching, and creating or providing cheat sheets, memoranda, directions, instructions, or manuals, pertaining to the preparation of federal tax returns;

- (5) maintaining, assigning, holding, using, leasing, or obtaining a Preparer Tax Identification Number (“PTIN”) or an Electronic Filing Identification Number (“EFIN”);
- (6) advising, counseling, or instructing anyone for compensation or otherwise regarding substantive tax law on the preparation of federal tax returns;
- (7) referring any taxpayer to a tax preparation firm or to a tax return preparer, or otherwise suggesting that a taxpayer use any given tax preparation firm or any tax return preparer;
- (8) collecting or gathering Forms W-2 and Forms 1099 from individuals or entities who want to have a federal tax return prepared, or referring any person or entity to a tax preparation firm or to a tax return preparer or otherwise suggesting that a taxpayer engage any given tax preparation firm or tax return preparer;
- (9) providing office space, equipment, or services for, or in any other way facilitating, the work of any person or entity that is in the business of preparing or filing federal tax returns or other federal tax documents or forms for others or representing persons before the Internal Revenue Service;
- (10) engaging in any other activity subject to penalty under 26 U.S.C. §§ 6694, 6695, 6701, or any other penalty provision in the Internal Revenue Code; and
- (11) engaging in any conduct that substantially interferes with the proper administration and enforcement of the internal revenue laws;

E. That the Court, under 26 U.S.C. §§ 7402 and 7407, enter an order requiring Amberley Ritter, Wesley Franklin, Mark Burkart, Kenneth Garner, and DFW Integrity Taxpros Services, LLC to immediately and permanently close all store locations where Amberley Ritter, Wesley Franklin, Mark Burkart, Kenneth Garner, and DFW Integrity Taxpros Services, LLC have operated a tax return preparation business directly or through any entity;

F. That the Court, pursuant to 26 U.S.C. § 7402(a), enter an order prohibiting Amberley Ritter, Wesley Franklin, Mark Burkart, Kenneth Garner, and DFW Integrity Taxpros Services, LLC, directly or through any entity, from assigning, transferring, or selling any consulting agreement, independent contractor agreement, or employment contract related to any

tax return preparation business, in which they or any entity under their control is a party, or has been a party since 2020;

G. That the Court, pursuant to 26 U.S.C. § 7402(a), enter an order barring Amberley Ritter, Wesley Franklin, Mark Burkart, Kenneth Garner, and DFW Integrity Taxpros Services, LLC from:

- (1) selling to any individual or entity a list of customers, or any other customer information, regarding customers for whom the Defendants, and any other business or name through the Defendants or those acting at their direction, have at any time since 2020 prepared a tax return;
- (2) assigning, disseminating, providing, or giving to any current or former manager, tax return preparer, employee, consultant, or independent contractor of Amberley Ritter, Wesley Franklin, Mark Burkart, Kenneth Garner, and DFW Integrity Taxpros Services, LLC, or any other business through which they prepare tax returns or own or franchise a tax return preparation business, a list of customers or any other customer information for customers for whom the Defendants, and any other business or name through which the Defendants, or those acting at their direction, have at any time since 2020 prepared a tax return; and,
- (3) selling to any individual or entity any proprietary information pertaining to any business or entity through which Amberley Ritter, Wesley Franklin, Mark Burkart, Kenneth Garner, and DFW Integrity Taxpros Services, LLC, or those acting at their direction, have at any time since 2020 prepared a tax return;

H. That the Court, pursuant to 26 U.S.C. §§ 7402(a), 7407, and 7408, enter an order requiring Amberley Ritter, Wesley Franklin, Mark Burkart, Kenneth Garner, and DFW Integrity Taxpros Services, LLC to produce to counsel for the United States, within 30 days of the Court's order, a list that identifies by name, social security number, address, email address, and telephone number and tax period(s) all persons for whom the Defendants prepared, or caused to be prepared, federal tax returns or claims for a refund, for calendar years beginning in 2020 and continuing through the date of the Court's order;

I. That the Court, pursuant to 26 U.S.C. §§ 7402(a), 7407, and 7408, enter an order requiring Amberley Ritter, Wesley Franklin, Mark Burkart, Kenneth Garner, and DFW Integrity

Taxpros Services, LLC to send notice within 30 days of the Court's order, at their own expense, by certified mail, return receipt requested, and email, to (1) all persons for whom they have prepared federal tax returns, amended tax returns, or claims for refund from January 1, 2020 to the present; (2) all business partners, associates, landlords, employees or independent contractors of the Defendants from January 1, 2020 to the present; and (3) all tax preparation software providers from whom defendants have purchased or licensed any tax preparation software since January 1, 2020 to the present. The notice should consist of a copy of the order of permanent injunction, with no other enclosures, unless the enclosure is approved by the Department of Justice;

J. That the Court, pursuant to 26 U.S.C. §§ 7402(a), 7407, and 7408, enter an order requiring Amberley Ritter, Wesley Franklin, Mark Burkart, Kenneth Garner, and DFW Integrity Taxpros Services, LLC to post on all social media accounts and websites associated with their tax preparation services: "Amberley Ritter, Wesley Franklin, Mark Burkart, Kenneth Garner, and Tax Pros have been permanently prohibited from preparing federal income tax returns by the United States District Court for the Northern District of Texas. See the U.S. Department of Justice's website for further information." This statement will remain in place for a minimum of one year from the date of the order of permanent injunction and include a link or hyperlink, which will be provided by counsel for the United States, to any press release regarding the permanent injunction that the Department of Justice may issue and post on its website at www.justice.gov;

K. That the Court, pursuant to 26 U.S.C. §§ 7402(a), 7407, and 7408, enter an order requiring Amberley Ritter, Wesley Franklin, Mark Burkart, Kenneth Garner, and DFW Integrity Taxpros Services, LLC to surrender to the Secretary of the Treasury or his delegate all PTINs

held by, assigned to, or used by them pursuant to 26 U.S.C. § 6109, as well as any EFINs held by, assigned to, or used by them, including but not limited to the EFINs assigned to Wesley Franklin (with the first 3 numbers redacted) ending XXX756, XXX921, XXX958, XXX959, XXX960, XXX961, and XXX962;

L. That the Court, pursuant to 26 U.S.C. §§ 7402(a), 7407, and 7408, enter an order requiring Amberley Ritter, Wesley Franklin, Mark Burkart, Kenneth Garner, and DFW Integrity Taxpros Services, LLC, within 60 days of the Court's order, each to file a declaration, signed under penalty of perjury, confirming that they have received a copy of the Court's order and have timely complied with the terms described in paragraphs E through K above as memorialized in the Court's order;

M. That the Court, pursuant to 26 U.S.C. §§ 7402(a), 7407, and 7408, enter an order requiring Amberley Ritter, Wesley Franklin, Mark Burkart, Kenneth Garner, and DFW Integrity Taxpros Services, LLC to keep records of their compliance with the foregoing directives, which may be required to be produced to the Court, if requested, or to the United States;

N. That the Court, pursuant to 26 U.S.C. §§ 7402(a), 7407, and 7408, enter an order prohibiting Amberley Ritter, Wesley Franklin, Mark Burkart, Kenneth Garner, and DFW Integrity Taxpros Services, LLC from applying for, and from directing others to apply for, an EFIN or a PTIN;

O. That the Court, pursuant to 26 U.S.C. § 7402, enter an order requiring Amberley Ritter, Wesley Franklin, Mark Burkart, Kenneth Garner, and DFW Integrity Taxpros Services, LLC to disgorge to the United States the ill-gotten gains (the amount of which is to be determined by the Court) that Amberley Ritter, Wesley Franklin, Mark Burkart, Kenneth Garner, and DFW Integrity Taxpros Services, LLC received (in the form of tax preparation fees taken

directly from customers' tax refunds) for the preparation of tax returns that make or report false and/or fraudulent claims, deductions, credits, income, expenses, or other information that results in the understatement of taxes, prepared since 2020 by Amberley Ritter, Wesley Franklin, Mark Burkart, Kenneth Garner, and DFW Integrity Taxpros Services, LLC, and at any tax preparation store owned or managed by them;

P. That the Court retain jurisdiction over Amberley Ritter, Wesley Franklin, Mark Burkart, Kenneth Garner, and DFW Integrity Taxpros Services, LLC and over this action to enforce any permanent injunction entered against them;

Q. That this Court enter an order that explicitly permits the United States to conduct post-judgment discovery to ensure that Amberley Ritter, Wesley Franklin, Mark Burkart, Kenneth Garner, and DFW Integrity Taxpros Services, LLC fully comply with the permanent injunction entered against them; and

R. That this Court grant the United States such other relief as the Court deems appropriate.

Dated: September 10, 2025

NANCY E. LARSON
Acting United States Attorney

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