

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

UNITED STATES OF AMERICA,)
)
Plaintiff,) Case No. 1:20-cv-04148
)
v.)
)
ANTHONY JONES and)
AMJ ENTERPRISES LLC DBA)
CITI REFUND,)
)
Defendants.)
_____)

COMPLAINT

Plaintiff, United States of America, at the request of a delegate of the Secretary of the Treasury and at the direction of a delegate of the Attorney General, pursuant to 26 U.S.C. § 7401, brings this action seeking an injunction barring Anthony Jones (“Jones”) and AMJ Enterprises LLC dba Citi Refund (the “Company”) (collectively, “Defendants”) from preparing federal tax returns, engaging in the business of preparing federal tax returns, and employing any person acting as a federal tax return preparer. In support of this action, the United States alleges as follows:

Jurisdiction and Parties

1. Jurisdiction exists under 28 U.S.C. §§ 1340 and 1345, and 26 U.S.C. (“Internal Revenue Code” or “I.R.C.”) §§ 7402 and 7407.
2. Jones resides in Chicago, Illinois, within the jurisdiction of this Court.
3. The Company has two locations, both in Chicago, Illinois, within the jurisdiction of this Court.

4. Through the Company, Jones prepares federal income tax returns for others.

Jones's Schemes

5. Jones falsifies figures reported on Schedule C, including fabricating business expenses and mischaracterizing wage income as income from conducting a trade or business to fraudulently reduce his customers' tax liability (the "Schedule C Scheme").

6. The Earned Income Credit is a refundable tax credit available to lower-income taxpayers as a means to combat poverty. The amount of the refundable credit is a function of a taxpayer's income, with the amount of the credit declining as the taxpayer's income reaches zero, similar to a bell curve. To take advantage of this feature, Jones artificially creates or manipulates his customers' business income just enough to maximize the amount of the credit – reaching the so-called *sweet spot* (the "EIC Scheme").

7. Jones misrepresents his customers' filing statuses (the "Filing Status Scheme").

8. Jones falsifies figures reported on Form 2441, Child and Dependent Care Expenses, in order to falsely claim child care expenses (the "Child Care Scheme").

The IRS's Investigation

9. The IRS assigned a Revenue Agent to investigate Jones' return preparation practices for tax years 2013 through 2018, with a focus on tax year 2018.

10. As part of the investigation, the IRS conducted numerous interviews of Jones's customers to determine the accuracy of the items reported on their filed returns.

11. The IRS interviewed 18 of Jones's customers, representing 17 tax returns¹ that Jones prepared and filed in 2019 for the 2018 tax year.

¹ One of the returns was filed jointly.

12. All of the 18 interviewed customers identified Jones as the person who prepared and filed their returns for tax year 2018.

13. Of the 18 interviewed customers, all 16 stated that Jones had reported incorrect and false information on their returns.

14. Due to Jones’s use of one or more of the schemes described in paragraphs 5 through 8, the federal income tax returns of each interviewed customer underreported the customer’s correct tax liability, as follows:

Scheme	Number of Misrepresentations on the 15 Interviewed Customers’ Federal Tax Returns
EIC Scheme	8
Child Care Scheme	1
Schedule C Scheme	13
Filing Status Scheme	3
Total Misrepresentations:	26

15. Some specific examples of Jones’s fraudulent tax preparation activities, based on the IRS interviews with Jones’s customers, are as follows:

CUSTOMER 1

16. Jones prepared CUSTOMER 1’s tax return for tax year 2018.

17. CUSTOMER 1’s 2018 return contained fabricated business losses for a home bakery business of \$2,907 reported on Schedule C, resulting in an incorrect EIC amount of \$455, and reported an incorrect head-of-household filing status and fabricated child care expenses of \$3,000 for CUSTOMER 1’s child.

18. CUSTOMER 1 did not incur the reported business losses or child care expenses, and was not eligible for the head-of-household filing status reported on the return described in paragraph 17, above, nor did CUSTOMER 1 give Jones a reason to believe that such losses or expenses existed, or that the head-of-household filing status was proper. CUSTOMER 1 was married and lived with their spouse in 2018, indicating that the correct filing status to be either married filing jointly or married filing separately. CUSTOMER 1 did not provide Jones with any documentation supporting the losses, expenses, or filing status. In fact, CUSTOMER 1 did not operate any kind of business in 2018.

19. Jones reported false business losses, child care expenses, and incorrect filing status on CUSTOMER 1's 2018 return in order to reduce CUSTOMER 1's tax liabilities and to increase CUSTOMER 1's tax refund for the 2018 year.

CUSTOMER 2

20. Jones prepared CUSTOMER 2's tax return for tax year 2018.

21. CUSTOMER 2's 2018 return contained fabricated business profit for a home daycare business of \$9,442 reported on Schedule C, resulting in an incorrect EIC amount of \$5,590.

22. CUSTOMER 2 did not generate the business profit reported on the return described in paragraph 21, above, nor did CUSTOMER 2 give Jones a reason to believe that such profit existed. CUSTOMER 2 did not provide Jones with any documentation supporting the business profit. In fact, CUSTOMER 2 did not operate a home daycare business in 2018.

23. Jones reported false business profit on CUSTOMER 2's return in order to reduce CUSTOMER 2's 2018 tax liabilities and to increase CUSTOMER 2's tax refund for the 2018 year.

CUSTOMER 3

24. Jones prepared CUSTOMER 3's tax return for tax year 2018.

25. CUSTOMER 3's 2018 return contained fabricated business profit for being a self-employed child care assistant of \$4,850 reported on Schedule C, resulting in an incorrect EIC amount of \$3,222.

26. CUSTOMER 3 did not generate the business profit reported on the return described in paragraph 25, above, nor did CUSTOMER 3 give Jones a reason to believe that such profit existed. CUSTOMER 3 did not provide Jones with any documentation supporting the business profit. In fact, CUSTOMER 3 did not operate any side businesses in 2018.

27. Jones reported false business profit on CUSTOMER 3's return in order to reduce CUSTOMER 3's tax liabilities and to increase CUSTOMER 3's tax refund for the respective year.

CUSTOMER 4

28. Jones prepared CUSTOMER 4's tax return for tax year 2018.

29. CUSTOMER 4's 2018 return contained fabricated business profit for a house cleaning business of \$8,256 reported on Schedule C, resulting in an incorrect EIC amount of \$6,041.

30. While CUSTOMER 4 did operate a house cleaning business, CUSTOMER 4 did not generate the business profit reported on the return described in paragraph 29, above, nor did CUSTOMER 4 give Jones a reason to believe that such profit existed. CUSTOMER 4 did not provide Jones with any documentation supporting the reported business profit. CUSTOMER 4 made about \$495 [in profit?] in gross revenue from the house cleaning business during 2018, and not the \$8,256 reported on their return.

31. Jones reported false business profit on CUSTOMER 4's return in order to reduce CUSTOMER 4's tax liabilities and to increase CUSTOMER 4's tax refund for the respective year.

CUSTOMER 5

32. Jones prepared CUSTOMER 5's tax return for tax year 2018.

33. CUSTOMER 5's 2018 return contained fabricated business profit for a restaurant cashier business of \$14,695 reported on Schedule C, resulting in an incorrect EIC amount of \$5,570.

34. CUSTOMER 5 did not generate the business profit reported on the return described in paragraph 33, above, nor did CUSTOMER 5 give Jones a reason to believe that such profit existed. CUSTOMER 5 did not provide Jones with any documentation supporting the business profit. In fact, CUSTOMER 5 did not operate any business in 2018.

35. Jones reported false business profit on CUSTOMER 5's return in order to reduce CUSTOMER 5's tax liabilities and to increase CUSTOMER 5's tax refund for the respective year.

CUSTOMER 6

36. Jones prepared CUSTOMER 6's tax return for tax year 2018.

37. CUSTOMER 6's 2018 return contained fabricated business profit for a homecare aide business of \$12,840 reported on Schedule C, resulting in an incorrect EIC amount of \$6,431.

38. While CUSTOMER 6 did operate a homecare aide business, CUSTOMER 6 did not generate the business profit reported on the return described in paragraph 37, above, nor did CUSTOMER 6 give Jones a reason to believe that such profit existed. CUSTOMER 6 did not

provide Jones with any documentation supporting the reported business profit. CUSTOMER 6 made about \$1,200 total revenue from the homecare aide business during 2018, and not the \$12,840 reported on their return.

39. Jones reported false business profit on CUSTOMER 6's return in order to reduce CUSTOMER 6's tax liabilities and to increase CUSTOMER 6's tax refund for the respective year.

CUSTOMER 7

40. Jones prepared CUSTOMER 7's tax return for tax year 2018.

41. CUSTOMER 7's 2018 return reported an incorrect filing status of single.

42. CUSTOMER 7 was not eligible for the single filing status reported on the return described in paragraph 41, above, nor did CUSTOMER 7 give Jones a reason to believe that the filing status of single was proper. CUSTOMER 7 was married and lived with their spouse in 2018, indicating that the correct filing status was either married filing jointly or married filing separately. CUSTOMER 1 did not provide Jones with any documentation supporting the filing status.

43. Jones reported an incorrect filing status on CUSTOMER 7's 2018 return in order to reduce CUSTOMER 7's tax liabilities and to increase CUSTOMER 7's tax refund for the 2018 year.

CUSTOMER 8

44. Jones prepared CUSTOMER 8's tax return for tax year 2018.

45. CUSTOMER 8's 2018 return contained fabricated business profit from a jewelry-making business of \$9,344 reported on Schedule C, resulting in an incorrect EIC amount of \$5,390.

46. While CUSTOMER 8 did operate a jewelry-making business, CUSTOMER 8 did not generate the business profit reported on the return described in paragraph 45, above, nor did CUSTOMER 8 give Jones a reason to believe that such profit existed. CUSTOMER 8 did not provide Jones with any documentation supporting the reported business profit. CUSTOMER 8 made about \$2,400 in profit from the jewelry-making business during 2018, and not the \$9,344 reported on their return.

47. Jones reported false business profit on CUSTOMER 8's return in order to reduce CUSTOMER 8's tax liabilities and to increase CUSTOMER 8's tax refund for the respective year.

CUSTOMER 9

48. Jones prepared CUSTOMER 9's tax return for tax year 2018.

49. CUSTOMER 9's 2018 return contained fabricated business profit for a courier business of \$8,232 reported on Schedule C, resulting in an incorrect EIC amount of \$3,188.

50. CUSTOMER 9 did not generate the business profit reported on the return described in paragraph 49, above, nor did CUSTOMER 9 give Jones a reason to believe that such profit existed. CUSTOMER 9 did not provide Jones with any documentation supporting the business profit. In fact, CUSTOMER 9 did not operate a courier business in 2018.

51. Jones reported false business profit on CUSTOMER 9's return in order to reduce CUSTOMER 9's tax liabilities and to increase CUSTOMER 9's tax refund for the respective year.

CUSTOMER 10

52. Jones prepared CUSTOMER 10's tax return for tax year 2018.

53. CUSTOMER 10's 2018 return contained fabricated business profit for a hair-braiding business of \$13,370 reported on Schedule C, resulting in an incorrect increase of the EIC amount by \$126 and an incorrect increase of the Additional Child Tax Credit amount by \$163.

54. While CUSTOMER 10 did operate a hair-braiding business, CUSTOMER 10 did not generate the business profit reported on the return described in paragraph 53, above, nor did CUSTOMER 10 give Jones a reason to believe that such profit existed. CUSTOMER 10 did not provide Jones with any documentation supporting the reported business profit. CUSTOMER 10 made about \$12,200 profit from the hair-braiding business during 2018, and not the \$13,370 reported on their return.

55. Jones reported false business profit on CUSTOMER 10's return in order to reduce CUSTOMER 10's tax liabilities and to increase CUSTOMER 10's tax refund for the respective year.

CUSTOMER 11

56. Jones prepared CUSTOMER 11's tax return for tax year 2018.

57. CUSTOMER 11's 2018 return contained fabricated business expenses of \$77,216 for a rideshare driver business reported on Schedule C.

58. While CUSTOMER 11 did operate a rideshare driver business, CUSTOMER 11 did not incur all the business expenses reported on the return described in paragraph 57, above, nor did CUSTOMER 11 give Jones a reason to believe that such expenses were incurred. CUSTOMER 11 did not provide Jones with any documentation supporting the reported business expenses.

59. Jones reported false business expenses on CUSTOMER 11's return in order to reduce CUSTOMER 11's tax liabilities by \$1,083 and therefore to increase CUSTOMER 11's tax refund for the respective year.

CUSTOMER 12

60. Jones prepared CUSTOMER 12's tax return for tax year 2018.

61. CUSTOMER 12's 2018 return contained inflated business expenses for rideshare driver business reported on Schedule C.

62. While CUSTOMER 12 did operate a rideshare driver business, CUSTOMER 12 did not incur all the business expenses reported on the return described in paragraph 61, above, nor did CUSTOMER 12 give Jones a reason to believe that such expenses were incurred. CUSTOMER 12 did not provide Jones with any documentation supporting the reported business expenses. Jones added duplicative vehicle expenses on CUSTOMER 12's return, when no such additional expenses were incurred.

63. Jones reported false business expenses on CUSTOMER 12's return in order to reduce CUSTOMER 12's tax liabilities by \$406 and therefore to increase CUSTOMER 12's tax refund for the respective year.

CUSTOMER 13

64. Jones prepared CUSTOMER 13's tax return for tax year 2018.

65. CUSTOMER 13's 2018 return contained fabricated business expenses such as contract labor, taxes, licensing, and insurance for a landscaping business of \$6,966 reported on Schedule C.

66. CUSTOMER 13 did not incur the business expenses reported on the return described in paragraph 65, above, nor did CUSTOMER 13 give Jones a reason to believe that

such expenses were incurred. CUSTOMER 13 did not provide Jones with any documentation supporting the business expenses. CUSTOMER 13 did not incur the expenses referred to in paragraph 65, above. In fact, CUSTOMER 13 did not operate a landscaping business.

67. Jones reported false business expenses on CUSTOMER 13's return in order to reduce CUSTOMER 13's tax liabilities by \$882 and therefore to increase CUSTOMER 13's tax refund for the respective year.

CUSTOMER 14

68. Jones prepared CUSTOMER 14's tax return for tax year 2018.

69. CUSTOMER 14's 2018 return contained a fabricated gambling loss deduction of \$30,000 reported on Schedule A.

70. CUSTOMER 14 did not incur the full gambling loss reported on the return described in paragraph 69, above, nor did CUSTOMER 14 give Jones a reason to believe that such expenses were incurred. CUSTOMER 14 did not provide Jones with documentation supporting the full amount of the gambling loss.

71. Jones reported the false gambling losses on CUSTOMER 14's return in order to reduce CUSTOMER 14's tax liabilities by \$720 and to increase CUSTOMER 14's tax refund for the respective year.

CUSTOMER 15

72. Jones prepared CUSTOMER 15's tax return for tax year 2018.

73. CUSTOMER 15's 2018 return contained an incorrect filing status, head of household.

74. CUSTOMER 15 was not eligible for the head of household filing status reported on the return described in paragraph 73, above, because CUSTOMER 15 was married and living

with their spouse during 2018, nor did CUSTOMER 15 give Jones a reason to believe that CUSTOMER 15 was eligible for that filing status. CUSTOMER 15 did not provide Jones with any documentation supporting eligibility for that filing status.

75. Jones reported an incorrect filing status on CUSTOMER 15's return in order to reduce CUSTOMER 15's tax liabilities by \$1,191 and therefore to increase CUSTOMER 15's tax refund for the respective year.

IRS Warnings to Jones

76. The IRS sent Jones warning letters on September 7, 2018 and February 1, 2019, warning him of possible inaccurate returns and reminding him of a return preparer's due diligence responsibility.

77. In 2016, the IRS assessed Jones a penalty of \$5,500 for his failure to comply with return preparer due diligence requirements under I.R.C. § 6695(g) during the 2014 tax year. Jones told the IRS that his EIC guidance and procedures are not written down. He said he uses his "gut feeling" when it comes to the EIC. The IRS found errors with 11 of the 50 returns reviewed. He was presented with an IRS Form 5816, *Report of Tax Preparer Penalty Case*, which detailed the reason for the penalty. On January 8, 2016, Jones signed Form 5816, agreeing to comply with the due diligence requirements in the future, consenting to the immediate assessment of the penalties, and waiving his appeal rights with respect to the penalty.

78. In 2018, the IRS again assessed Jones a penalty, for \$11,730, for his failure to comply with return preparer due diligence requirements under I.R.C. § 6695(g) during the 2016 tax year. The IRS found that Jones made errors similar to those described in paragraph 76, above, finding 23 due diligence failures. He was again presented with Form 5816 and, on March 15, 2018, Jones again signed Form 5816, agreeing to comply with the due diligence requirements

in the future, consenting to the immediate assessment of the penalties, and waiving his appeal rights with respect to the penalty.

79. One of Jones' customers filed a formal IRS complaint against him on March 11, 2018, for preparer misconduct. The customer stated that Jones had diverted her refund into his own bank account and she never received her refund. Further, she stated that Jones never provided her with a copy of her tax return.

80. Despite these warnings and the penalty, Jones continued his pattern of preparing returns using the schemes described in paragraphs 6 through 8, above.

Harm to United States from Jones's Activities

81. The fraudulent returns that Jones has prepared and filed have caused – and continue to cause – substantial harm to the Government by falsely reducing his customers' reported tax liabilities and helping taxpayers avoid paying their fair share of tax or obtain refunds to which they were not entitled.

82. Honest return preparers are harmed because fraudulent preparers may be able to lure customers away with the promise of lower tax liabilities and larger refunds.

83. The 16 customer interviews show a substantial tax harm to the United States.

84. Because these 15 returns are only a small portion of the 685 returns prepared by Jones during processing year 2019, it is likely that the tax loss to the United States is much larger than known at present. Of the 685 returns Jones prepared in 2019, 396 returns claimed the EIC; 284 returns reported child care expenses; 570 returns reported Schedule C self-employment income or loss; and 572 returns claimed refunds.

85. The United States is also harmed because the IRS must devote some of its limited resources to investigating Jones' conduct as a tax return preparer, detecting and examining

inaccurate and fraudulent returns filed by Jones, and attempting to assess and collect from his customers unpaid taxes and penalties, some of which may not be collectible.

COUNT I: Injunction under I.R.C. § 7407 for Violation of I.R.C. §§ 6694 and 6695 for Deceptive or Fraudulent Conduct that Interferes with Internal Revenue Code Administration

86. The United States incorporates by reference the allegations in all preceding paragraphs as though fully set forth herein.

87. Pursuant to I.R.C. § 7407, a court is authorized to enjoin a tax return preparer who, among other things, engages in conduct subject to penalty under I.R.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.

88. I.R.C. § 7701(a)(36) defines a “tax return preparer” as a person who prepares for compensation, or who employs one or more persons to prepare for compensation, any return or a substantial portion thereof.

89. Jones is a tax return preparer within the meaning of I.R.C. § 7701(a)(36).

90. I.R.C. § 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.

91. I.R.C. § 6694(e) defines understatement of liability to include any understatement of tax due or “overstatement of the net amount creditable or refundable.”

92. In violation of I.R.C. § 6694(a), Jones prepared returns for customers that understated his customers' tax liabilities and that he knew or should have known contained positions for which there was no substantial authority or for which there was no reasonable basis.

93. I.R.C. § 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.

94. In violation of I.R.C. § 6694(b), Jones prepared tax returns for customers that he knew or reasonably should have known contained incorrect figures by engaging in the following schemes: the Schedule C Scheme, the EIC Scheme, the Child Care Scheme, and the Filing Status Scheme.

95. In violation of I.R.C. § 6694(b), Jones recklessly or intentionally disregarded rules and/or regulations by manipulating his customers' filing statuses, business income and expenses, and itemized deductions in order to understate his customers' tax liabilities.

96. I.R.C. § 6695(g) penalizes a tax return preparer who fails to comply with due diligence requirements imposed by the Secretary of the Treasury with respect to determining eligibility for the EIC or eligibility to file as a head of household.

97. In violation of I.R.C. § 6695(g), Jones repeatedly failed to exercise due diligence by filing tax returns claiming EICs and claiming a head of household filing status that he knew or had reason to know were incorrect.

98. An injunction against Jones is necessary and appropriate to prevent the recurrence of their conduct subject to penalty under I.R.C. §§ 6694 and 6695.

99. Anything less than a permanent injunction and complete bar on the preparation of tax returns is unlikely to stop him from preparing fraudulent tax returns.

COUNT II: Injunction under I.R.C. § 7402(a) for Unlawful Interference with Enforcement of the Internal Revenue Laws and Appropriateness of Injunctive Relief

100. The United States incorporates by reference the allegations in all preceding paragraphs above, as though fully set forth herein.

101. Pursuant to I.R.C. § 7402(a), a court is authorized to issue orders of injunctions as may be necessary or appropriate to enforce the internal revenue laws.

102. I.R.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.

103. Jones’s activities described above substantially interfere with the enforcement of the internal revenue laws because he has prepared and filed numerous fraudulent tax returns that resulted in customers not paying their correct federal tax liabilities and receiving tax refunds to which they were not entitled.

104. Jones has shown that he should not be allowed to continue to prepare tax returns because he has deliberately played the audit lottery on behalf of his customers. By manipulating the income and expenses on Schedule C, items for which there is no independent third-party reporting, he has selected schemes that the IRS can detect only by auditing returns or interviewing their customers. Because he knows that the IRS lacks the resources to audit every return that includes these schedules, he is actively subverting the American tax system, which relies on taxpayers to self-report their income and expenses fully and accurately.

105. An injunction prohibiting Jones from preparing or assisting in the preparation of tax returns is needed to stop him from preparing and filing fraudulent tax returns and to prohibit him from otherwise interfering with the proper administration and enforcement of the internal revenue laws now and in the future.

106. If he is not enjoined, the United States will continue to suffer irreparable harm from the underpayment of taxes and the exhaustion of resources to enforce the internal revenue laws.

107. The public interested would be advanced by enjoining Jones because an injunction will stop his illegal conduct and the harm that conduct is causing the United States Treasury and the public.

108. An injunction under I.R.C. § 7402 is necessary and appropriate, because the United States has no adequate remedy at law.

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

A. That the Court find that the Defendants have repeatedly engaged in conduct subject to penalty under I.R.C. §§ 6694 and 6695, and in other fraudulent or deceptive conduct that substantially interferes with the proper administration of the tax laws; that, pursuant to I.R.C. § 7407, an injunction merely prohibiting conduct subject to penalty under I.R.C. §§ 6694 and 6695, or other fraudulent or deceptive conduct, would be insufficient to prevent Jones' interference with the proper administration of the tax laws; and that Defendants should be permanently enjoined from acting as a tax return preparer;

B. That the Court find that the Defendants have interfered with the enforcement of the internal revenue laws and that injunctive relief is appropriate to prevent the recurrence of that conduct pursuant to I.R.C. § 7402(a);

C. That the Court, pursuant to I.R.C. §§ 7402(a) and 7407, enter a permanent injunction enjoining Defendants, their officers, agents, servants, employees, and attorneys, and anyone in active concert or participation with them, from directly or indirectly:

1. Preparing or assisting in the preparation of federal tax returns, amended returns, and other related documents and forms for anyone other than themselves;
2. Advising, counseling, or instructing anyone about the preparation of a federal tax return;
3. Owning, managing, controlling, working for, or volunteering for a tax-return preparation business;
4. 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 IRS;
5. Advertising tax return preparation services through any medium, including the internet and social media;
6. Maintaining, assigning, holding, using, or obtaining a Preparer Tax Identification Number (PTIN) or an Electronic Filing Identification Number (EFIN);
7. Representing customers in connection with any matter before the IRS;
8. Employing any person to work as a federal income tax return preparer;
9. Referring any customer to a tax preparation firm or a tax return preparer, or otherwise suggesting that a customer use any particular tax preparation firm or tax return preparer;
10. Selling, providing access, or otherwise transferring to any person some or all of the proprietary assets of Anthony Jones or AMJ Enterprises LLC d/b/a Citi Refund generated by their tax return preparation activities, including but not limited to customer lists; and/or

11. Engaging in any conduct that substantially interferes with the administration and enforcement of the internal revenue laws.

D. That the Court, pursuant to I.R.C. §§ 7402(a) and 7407, enter a permanent injunction enjoining the Jones and the Company, its officers, agents, servants, employees, and attorneys, and anyone in active concert or participation with him, from directly or indirectly operating a business that prepares federal tax returns;

E. That the Court enter an order requiring the Defendants to prominently post a copy of its permanent injunction (with dimensions of at least 12 by 24 inches) at the locations where Jones and the Company conduct business;

F. That the Court, pursuant to I.R.C. §§ 7402(a) and 7407, enter an order requiring the Defendants 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 they prepared federal tax returns or claims for a refund, for processing years beginning in 2018 and continuing through this litigation;

G. That the Court, pursuant to I.R.C. §§ 7402(a) and 7407, enter an order requiring the Defendants, within 30 days of receiving the Court's order, to contact by U.S. mail and, if an email address is known, by email, all persons for whom they have prepared federal tax returns, amended tax returns, or claims for refund since January 2018, as well as all employees or independent contractors Jones, or the Company, has had since January 2018, and to inform them of the permanent injunction entered against them by sending each of them a copy of the order of permanent injunction, with no other enclosures unless approved by the Department of Justice;

H. That the Court, pursuant to I.R.C. §§ 7402(a) and 7407, enter an order requiring the Defendants, within 45 days of receiving the Court's order, to file a declaration, signed under

penalty of perjury, confirming that they have received a copy of the Court's order and complied with the terms described in paragraphs E and G of this Complaint;

I. That this Court grant the United States such other and further relief as the Court deems appropriate.

UNITED STATES OF AMERICA

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