

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

Case No. 2:13-cv-14121-JEM

UNITED STATES OF AMERICA,	)
	)
Plaintiff,	)
	)
v.	)
	)
INUKA RHAHEED,	)
JACQUELINE RHAHEED, and	)
WILENS BERTRAND,	)
	)
Defendants.	)

**FINAL JUDGMENT OF PERMANENT INJUNCTION**

Plaintiff, the United States of America, has filed a complaint seeking a permanent injunction against defendant Wilens Bertand. Wilens Bertand admits that this Court has jurisdiction over him and over the subject matter of this action pursuant to 28 U.S.C. §§ 1340 and 1345 and under 26 U.S.C. §§ 7402, 7407, and 7408. Wilens Bertand does not admit or deny any of the other allegations in the complaint.

Wilens Bertand voluntarily consents to entry of this permanent injunction under 26 U.S.C. §§ 7402, 7407, and 7408 and waives any right he may have to appeal from this permanent injunction. The parties waive the entry of findings of fact and conclusions of law under Federal Rules of Civil Procedure 52 and 65. The parties agree that entry of this permanent injunction neither precludes the Internal Revenue Service from assessing penalties against Wilens Bertand for asserted violations of the Internal Revenue Code nor precludes Wilens Bertand from contesting any such penalties. The parties further agree that entry of this Order for Permanent Injunction resolves only this civil injunction action, and neither precludes the government from

pursuing any other current or future civil or criminal matters or proceedings, nor precludes Wilens Bertrand from contesting his liability in any matter or proceeding.

Accordingly, it is hereby ORDERED, ADJUDGED, and DECREED that:

1. This Court has jurisdiction of this action pursuant to 28 U.S.C. §§ 1340, 1345 and 26 U.S.C. § 7402(a).

2. Wilens Bertand and his representatives, agents, servants, employees, attorneys, independent contractors, and any other person working in concert or participation with him directly or indirectly, are enjoined under 26 U.S.C. §§ 7402(a), 7407, and 7408 from:

- (a) Preparing, filing, or assisting in the preparation or filing of others' federal tax returns, amended returns, claims for refund or any other federal tax-related documents;
- (b) Engaging in conduct subject to penalty under I.R.C. §§ 6694 or 6701;
- (c) Representing, or appearing on behalf of, any person before the Internal Revenue Service; and
- (d) Engaging in conduct that substantially interferes with the administration and enforcement of the internal revenue laws.

3. Wilens Bertand is ORDERED, pursuant to 26 U.S.C. § 7402(a), to mail, within thirty days of this order, a notice to all persons for whom he prepared federal tax returns, amended returns, refund claims, or any other federal tax-related documents since January 1, 2006. This notice shall inform them that a permanent injunction has been entered against him and contain a copy of that injunction. Further, Wilens Bertand is ORDERED, pursuant to 26 U.S.C. § 7402(a), to file a certificate of compliance, signed under the penalty of perjury and stating that he has complied with this paragraph, with the Court within thirty days of this order.

4. Wilens Bertand is ORDERED, pursuant to 26 U.S.C. § 7402(a), to produce to counsel for the United States, within thirty days of this order, a complete list of all persons identified in

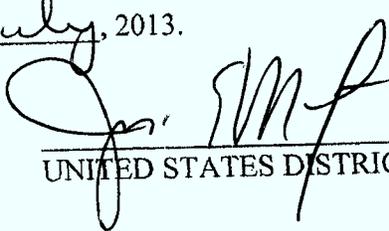
paragraph 3, identifying each person's name, social security number, address, e-mail address, telephone number, and the tax period(s) for which he prepared a tax-related document for that person.

5. Wilens Bertand is ORDERED, pursuant to 26 U.S.C. § 7402(a), to provide a copy of this permanent injunction within thirty days of this order to all of his principals, officers, managers, employees, and independent contractors, and provide to counsel for the United States within thirty days of this order a signed and dated acknowledgment of receipt for each person whom he provided such a copy.

6. The United States be permitted to engage in post-judgment discovery to monitor and ensure Wilens Bertand's compliance with the terms of this permanent injunction.

7. This Court shall retain jurisdiction over Wilens Bertand and over this action to implement and enforce this Final Judgment of Permanent Injunction.

IT IS SO ORDERED this 30 day of July, 2013.

  
UNITED STATES DISTRICT JUDGE

*Consented and agreed to by:*

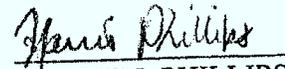
Date: 3/12/13

  
WILENS BERTRAND  
Register #: 96621-004  
FDC Miami  
Federal Detention Center  
P.O. BOX 019120  
Miami, FL 33101

*Pro Se*

Date: 3/25/13

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