

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
STATESBORO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. _____

LAKESIA MICHELLE MILLS
D/B/A WILLIS TAX SERVICE,

Defendant.

_____ /

COMPLAINT FOR INJUNCTIVE RELIEF

The Plaintiff, United States of America, alleges as follows for its complaint to enjoin Lakesia Michelle Mills d/b/a Willis Tax Service from preparing tax returns in violation of the internal revenue laws.

1. The United States of America seeks to permanently enjoin Lakesia Michelle Mills d/b/a Willis Tax Service from:

- (a) Preparing, filing, assisting in the preparation or filing of, or directing the preparation of federal income tax returns, amended returns, or other tax-related documents and forms, including any electronically-submitted tax returns or tax-related documents, for any entity or person other than herself;
- (b) Preparing, filing or assisting in the preparation or filing of, or directing the preparation of federal tax returns that she knows will result in the understatement of any tax liability or the overstatement of federal tax refunds;
- (c) Engaging in conduct subject to penalty under 26 U.S.C. §§ 6694, 6695, or 6701, including understating a taxpayer's liability, overstating a taxpayer's refund and/or failing to supply a list of clients or provide copies of clients' tax returns to the Internal Revenue Service on request; and
- (d) Engaging in conduct that substantially interferes with the proper administration and enforcement of the tax laws.

2. This action has been authorized by the Chief Counsel of the Internal Revenue Service, a delegate of the Secretary of the Treasury of the United States, and is commenced at the direction of the Attorney General of the United States, in accordance with 26 U.S.C. §§ 7401, 7407, and 7408.

Jurisdiction and Venue

3. Mills resides in and operates her tax preparation business out of her home in Adrian, Georgia. Mills conducts her tax preparation business as Willis Tax Service, an unincorporated entity.

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

5. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b) and 26 U.S.C. §§ 7407(a) and 7408(a), because Mills resides within, conducts business within, and a substantial part of the events giving rise to the United States claims occurred within this judicial district.

Summary of Mills' Activities

6. Mills began preparing tax returns in early January 2011 at the latest. Mills has taken some online classes with Southern University, the University of Phoenix and Kaplan University, and completed an online tax preparation course. Mills did not obtain a degree from any of these institutions. Mills also does not hold any professional licenses and is not a member of any professional organizations.

7. Mills is currently operating her tax preparation business and is preparing Individual Income Tax Returns (Form 1040 or Form 1040X) for other taxpayers. Mills prepares

returns either individually or doing business as Willis Tax Service, an unincorporated sole proprietorship.

8. Since early 2011, most of the income tax returns prepared by Mills have understated the filing taxpayer's liability or created or overstated a refund by falsely claiming the First-Time Homebuyer Credit ("FTHC").

9. In this scheme, Mills prepared amended returns – mainly for tax years 2009 and 2010 (as well as at least one original tax return for 2011 and 2012) – that falsely claimed that the taxpayer was entitled to the FTHC, a credit against federal income tax of the lesser of ten percent of a home's purchase or \$8,000 designed for first-time homebuyers. Mills received a copy of the taxpayer's original Form 1040 and then provided customers a false settlement statement and proof of insurance to support the credit, along with an addressed envelope containing the fraudulent amended tax return. Each return claimed the maximum FTHC of \$8,000 for the particular tax year (mainly 2009 or 2010). The taxpayer would then pay Mills cash for preparing the amended return.

10. While none of the prepared tax returns disclosed Mills' identity or that she had prepared the returns, the returns all had numerous hallmarks indicating that the same person prepared them:

- (a) Amended returns (1040X) were hand prepared and did not identify a paid preparer. The tax returns were prepared for taxpayers located in Adrian, Georgia and the surrounding area, including Cochran, Dublin, Jeffersonville, Perry, Sandersville, Swainsboro, and Wrightsville.

- (b) Each return had the same or similar attachments which had been altered to conform to the name and address of that particular taxpayer. Most of these attachments included a settlement sheet from the United States Department of Housing and Urban Development (“HUD”) showing the sale of a residence with a contract price of \$90,000 and a proof of insurance purportedly sold by a GEICO Insurance Agency. Several of the amended returns filed in 2013 contained a purchase price of \$95,664.00 and did not include any proof of insurance.
- (c) The information contained on the HUD settlement statements did not vary substantively, with the exception of the seller’s name, the name of the bank, and an occasional variation in the deposit and loan amounts and settlement date. The name of the bank was changed to reflect the location of the taxpayer, with the bank being totally fictitious in some cases (for example the Bank of Dublin.)
- (d) For each taxpayer attaching a proof of insurance, the GEICO proof of insurance was only changed to include the individual taxpayer’s name and address. The underlying coverage amounts, policy number, producer agent number, effective dates of coverage, insurance policy premium and date of the policy, however, did not change.
- (e) The 1040X amended return included a copy of the taxpayer’s driver’s license.

- (f) Each amended return was mailed in a large envelope with the same distinctive handwriting.

11. In total, Mills prepared at least 455 federal income tax returns or amended returns that claimed FTHCs totaling \$3,640,000. Specifically, Mills prepared 77 amended returns for tax year 2009 totaling \$616,000, 376 amended returns for tax year 2010 totaling \$3,008,000, and then one each for 2011 and 2012 even though the FTHC was not available for those two years. The FTHC was only available for tax years 2008 through 2010. Unfortunately, blatant abuses and fraud by return preparers compromised the program.

12. The taxpayers filed the returns Mills prepared with the Kansas City Service Center. Because the amended returns had similar attachments and were mailed with envelopes bearing similar distinctive handwriting, the Service Center referred these returns for further investigation.

13. Since the returns failed to identify the tax return preparer, the IRS interviewed taxpayers who filed the sampled amended returns. The taxpayers informed the IRS that a person named “Keisha” from Adrian, Georgia prepared the amended returns. The IRS revenue agent then interviewed Dublin taxpayers and showed them the driver’s license pictures for Mills and Tibarrius Bernard Willis (her husband) and a picture of her house, located at 311 Nora Boulevard, Adrian, Georgia (“Mills’ residence”). Nine of twelve positively identified Mills as the person who prepared their tax return. Mills goes by the name “Keisha.”

14. Based upon the interviews, the following common facts emerged:

- (a) The clients went to Mills based upon word of mouth and because they thought she could get them government money.

- (b) The taxpayers did not understand the FTHC and were not first time home buyers. Some thought they could either get money for a down payment or get a loan to help them buy a house.
- (c) The taxpayers paid Mills cash to prepare the amended returns.
- (d) Most of the taxpayers went to Mills' residence where she prepared the tax returns in the front room that had a computer, printer and copier.
- (e) Mills personally prepared the amended tax returns. The clients then signed some forms and the papers were placed in a sealed envelope that was addressed by Mills. The returns were then mailed either by the clients or Mills.
- (f) The taxpayers did not receive a separate copy of their returns.
- (g) When shown copies of the tax returns, the taxpayers could not identify the altered documents attached to the returns (HUD-1, GEICO proof of insurance, *etc.*) and stated that they did not provide copies of the attached documents to Mills.
- (h) Of the 12 individuals interviewed, three received a refund, and nine did not receive a refund. Several individuals also disclosed that they knew other individuals who had received similar refunds based upon the FTHC.

15. Mills d/b/a Willis Tax Service prepared tax returns for the 2013 processing year and will continue to prepare and file customers' federal tax returns into the future.

Examples of Mills' Fraudulent Scheme

16. The examples for the three returns described below, demonstrate the scheme

employed by Mills on hundreds of returns she has prepared for taxpayers.

2010 1040X prepared for W.A.

17. In April 2011, Mills prepared a Form 1040X individual tax return for W.A. that claimed an \$8,000 FTHC. W.A. lived in East Dublin, Georgia and went to Mills' residence to meet with her.

18. When interviewed by the IRS and shown a picture of Mills and her residence, W.A. positively identified Mills as the tax preparer who prepared her 2010 amended return and Mills' residence as the location for her meeting. W.A. paid Mills cash to prepare the return. W.A. went to Mills after she heard from others that Mills could get her a FTHC.

19. On Form 5405 (First-Time Homebuyer Credit and Repayment of the Credit), W.A. reported that she purchased a home for \$95,664.00 from a seller in Dublin, Georgia. In support of this FTHC, W.A. attached a settlement statement and evidence of property insurance issued from American Security Insurance Company and obtained from the GEICO Insurance Agency, Inc., in Fredricksburg, Virginia. The Settlement Statement indicated that she purchased the property for \$90,000 and that the seller was owed \$95,664 at closing.

20. When interviewed, W.A. admitted that Mills provided her with the HUD Settlement Statement and the GEICO Evidence of Property Insurance documents attached to her 1040X. Furthermore, W.A. admitted that the documents were not correct, she did not purchase a property in 2010 and she had instead purchased a trailer about 15 years ago.

21. After preparing the return, Mills did not explain the 1040X to W.A. or provide her with a copy. W.A. signed the 1040X, and left it with Mills who, upon information and belief, addressed the envelope and mailed it to the IRS.

22. Even though W.A. was not entitled to receive a FTHC, she received an \$8,000 refund from the United States. Because the taxpayer was not entitled to the claimed FTHC, W.A. will now possibly be subject to additional assessments for federal income tax liabilities, penalties and interest.

2010 1040X prepared for P.S.

23. In August 2011, Mills prepared a 2010 Form 1040X individual tax return for P.S. that claimed an \$8,000 FTHC. P.S. lived in East Dublin, Georgia and went to Mills' residence to meet with her.

24. When interviewed by the IRS and shown a picture of Mills, P.S. positively identified Mills as the tax preparer. P.S. paid Mills cash to prepare the return. P.S. went to Mills after she was referred to her by a friend. P.S. also told the IRS that Mills asked her to refer more of her friends so that she could prepare their returns.

25. On Form 5405, P.S. reported that she purchased a home for \$95,664.00 from a seller in East Dublin, Georgia. In support of this FTHC, P.S. attached a Settlement Statement and evidence of property insurance issued from American Security Insurance Company and obtained from the GEICO Insurance Agency, Inc., in Fredricksburg, Virginia. The Settlement Statement indicated that she purchased the property for \$90,000 and that the seller was owed \$95,664 at closing.

26. The IRS interviewed P.S., and she admitted that Mills provided her with the HUD Settlement Statement and the GEICO Evidence of Property Insurance documents attached to her 1040X. Furthermore, P.S. admitted that the documents were not correct, there was no "Bank of

Dublin,” she did not purchase a property in 2010 and she rented, rather than owned, the property listed on the Form 5405.

27. After preparing the return, Mills did not explain the 1040X to P.S. or provide her with a copy. P.S. signed the return in August 2011, and the 1040X was filed with the IRS.

28. The IRS determined that P.S. was not entitled to the FTHC and denied her the \$8,000 refund claim.

2009 1040X Tax return prepared for R.H.

29. In June 2011, Mills prepared a Form 1040X individual tax return for R.H. for tax year 2009 that claimed an \$8,000 FTHC. R.H. lived in Dublin, Georgia and went to Mills’ residence to meet with her.

30. When interviewed by the IRS and shown a picture of Mills and her residence, R.H. positively identified Mills as the tax preparer and Mills’ residence as the location for their meeting. R.H. paid Mills cash to prepare the return and hoped to get money to buy a house.

31. On Form 5405, R.H. reported that he purchased a home for \$95,664.00 from a seller in Dublin, Georgia. In support of this FTHC, Holmes attached a HUD Settlement Statement and evidence of property insurance issued from American Security Insurance Company and obtained from the GEICO Insurance Agency, Inc., in Fredricksburg, Virginia. The Settlement Statement indicated that he purchased the property for \$90,000 and that the \$95,664 was the amount owed the seller.

32. When interviewed by the IRS, R.H. admitted that Mills provided him with the

HUD Settlement Statement and the GEICO Evidence of Property Insurance documents attached to his 1040X. Furthermore, R.H. admitted that the documents were not correct and that he did not purchase a property in 2009.

33. After preparing the return, Mills did not explain the 1040X to R.H. or provide him with a copy. R.H. signed the 1040X after Mills told him to sign it, and he did not review the 1040X (and supporting attachments) prior to signing the return. R.H. then took the envelope Mills addressed and mailed it to the IRS.

34. The IRS determined that R.H. was not entitled to the FTHC and denied the \$8,000 refund claim.

Harm to the United States

35. Mills harmed the United States by preparing returns that claimed \$3,640,000 in fraudulent FTHCs using the scheme described above. From the returns reviewed, the IRS revenue agent identified 455 amended federal income tax returns that claimed a false FTHC of \$8,000 (or \$3.64 million).

36. Because the United States could not detect all of the false FTHC refund claims Mills prepared, Mills' actions caused the United States to issue refunds that the clients were not entitled to receive.

37. Mills' actions have forced the United States to expend significant resources to determine who prepared the returns, and it will incur substantial costs in reviewing, referring and examining the returns she prepared so that they can be corrected. The IRS, however, does not have the resources to identify and then examine all the tax returns that Mills prepared during the last several years. Thus, the IRS will never be able to fully recover all the tax refunds that were

improperly received due to Mills' fraudulent preparation of tax returns. In addition, the United States cannot recover the cost of the resources expended to examine and adjust the returns prepared by Mills and to collect the resulting deficiencies.

38. As a result of Mills' fraudulent practices, her clients could owe additional interest and penalties that they would not have otherwise owed if she did not prepare amended returns claiming the FTHC. For those who received a refund and cannot immediately pay the unpaid tax liabilities, including interest accruals, will face the continuing prospect of IRS collection activity (*e.g.*, wage levies, property seizures, etc. . .) for their unpaid tax liabilities. Mills' clients will also never be compensated for the time and money they expended during the examinations of their tax returns.

39. Mills knows or should know that her conduct is illegal. Mills has been actively preparing tax returns for almost three years. She has taken some business classes and presumably keeps current on tax law.

COUNT I
INJUNCTION UNDER 26 U.S.C. § 7407
FOR CONDUCT SUBJECT TO PENALTY UNDER 26 U.S.C. §§ 6694 AND 6695

40. The United States incorporates by reference the allegations in paragraphs 1 through 39.

41. Upon a finding that a tax return preparer engaged in prohibited conduct, 26 U.S.C. § 7407 authorizes a district court to enjoin a tax return preparer from engaging in certain prohibited conduct or from further acting as a tax return preparer. The prohibited conduct justifying an injunction includes, among other things, the following:

- (a) violating 26 U.S.C. § 6694 by preparing a return that contains an understatement of tax liability or overstatement of a credit or refund due to an unreasonable position which the return preparer knew or should have known was unreasonable;
- (b) violating 26 U.S.C. § 6694(b) by preparing a return that contains an understatement of tax liability or overstatement of a credit or refund which is due to a willful attempt to understate tax liability or a reckless or intentional disregard of rules or regulations;
- (c) violating 26 U.S.C. § 6695(a) by failing to furnish a completed copy of a prepared return or claim for refund to the taxpayer not later than when the return or claim is presented for such taxpayer's signature as required by 26 U.S.C. § 6107(a);
- (d) violating 26 U.S.C. § 6695(b) and (c) by failing to sign the prepared tax returns or failing to include on the returns a tax preparer identification number; and
- (e) engaging in any other fraudulent or deceptive conduct which substantially interferes with the proper administrations of the internal revenue laws.

42. Pursuant to section 7407(b), in order for a court to issue such an injunction, the court must find that:

- (a) The tax return preparer engaged in the prohibited conduct; and
- (b) Injunctive relief is appropriate to prevent the recurrence of such conduct.

43. If a tax return preparer's conduct is continual or repeated and the court finds that a narrower injunction (*i.e.*, against only the conduct) would not be sufficient to prevent the preparer's interference with the proper administration of the internal revenue laws, the court may permanently enjoin the person from acting as a tax return preparer. *See* 26 U.S.C. § 7407(b).

44. As described in paragraphs 7 through 34, above, Mills has continually and repeatedly engaged in conduct subject to penalty under 26 U.S.C. § 6694(a) by preparing returns that fraudulently claim the FTHC for ineligible taxpayers. Mills prepared returns that claim this credit with the knowledge that the positions she took on the returns were unreasonable and lacked substantial authority.

45. Mills has continually and repeatedly engaged in conduct subject to penalty under 26 U.S.C. § 6695(a) by failing to furnish a copy of the return to the taxpayer as required by 26 U.S.C. § 6107(a).

46. Mills continually and repeatedly engaged in conduct subject to penalty under 26 U.S.C. § 6695(b) by failing to properly identify herself and sign returns she prepared.

47. Because Mills has continually and repeatedly violated 26 U.S.C. §§ 6694 and 6695 and continues to substantially interfere with the administration of the internal revenue laws, this Court should enter the requested injunctive relief to prevent this misconduct. *See* 26 U.S.C. § 7407(b)(1). Absent an injunction, Mills will continue to conduct business as the Willis Tax Service, presumably at her residence. By continuing to prepare false federal income tax returns, she will continue to cause harm to the United States (as well as her customers).

48. A narrower injunction only against Mills' conduct - as opposed to enjoining her from acting as a tax return preparer - would be insufficient to prevent her continued interference with the proper administration of the federal tax laws. The sheer breadth and enormity of the fraud Mills has engaged in makes it unlikely that she could be stopped by merely enjoining the FTHC scheme. To carry out this scheme, Mills has created fictitious sales and supported them with fabricated documents. Mills has also sought to avoid being tied to this scheme by not

signing the returns and not including her preparer identification number. If stopped from pursuing the FTHC scheme, Mills would likely latch onto other schemes. Indeed, it is likely that the IRS has not identified all of her schemes.

49. Failure to permanently enjoin Mills from acting as a return preparer will require the IRS to spend additional resources to uncover all of her future schemes. The harm resulting from these schemes includes both the expenditure of the IRS's limited resources and the revenue loss caused by the improper credits Mills claims on returns she prepares. Accordingly, only a permanent injunction is sufficient to prevent further harm.

50. Therefore, because Mills has repeatedly and continually engaged in activities subject to an injunction under 26 U.S.C. § 7407(b)(1), a narrower injunction would not be sufficient to prevent her interference with the proper administration of the federal tax laws, and only a permanent injunction is sufficient to prevent future harm, this Court should permanently enjoin Mills from acting as a tax return preparer.

**COUNT II:
INJUNCTION UNDER 26 U.S.C. § 7408
FOR CONDUCT SUBJECT TO PENALTY UNDER 26 U.S.C. § 6701**

51. The United States incorporates by reference the allegations contained in paragraphs 1 through 50.

52. 28 U.S.C. § 7408 authorizes a district court to enjoin any person from engaging in conduct subject to penalty under 26 U.S.C. § 6701 if it finds that the person has engaged in such conduct and that injunctive relief is appropriate to prevent the reoccurrence of this conduct.

53. Conduct is subject to a penalty under section 6701 if a person aids or assists in the

preparation of any portion of a return when the person knows or has reason to believe that such portion will be used in connection with a material matter arising under federal tax law, and the person knows that such portion will result in an understatement of the tax liability of another person.

54. Mills has engaged in conduct subject to penalty under 26 U.S.C. § 6701 by preparing or directing the preparation of income tax returns or amended returns that claim an FTTC when she knew that the taxpayer was not entitled to the credit, and by preparing returns that claimed a credit that she knew to be false or inflated.

55. Mills repeated actions, such as those described in paragraphs 7 through 34 above, fall within 26 U.S.C. § 7408(c)(1), and injunctive relief is appropriate to prevent recurrence of this conduct. Mills, through Willis Tax Service, has engaged in conduct subject to penalty under section 6701 by preparing amended returns that claim the FTTC that she knows, or reasonably should have known, that her clients are not eligible for in order to artificially inflate their refunds. Mills has aided or assisted her clients in preparation of a portion of returns (including supplying the fraudulent HUD-1 and GEICO proof of insurance documents) she knew would be used in connection with the reporting of her clients' tax liabilities, a material matter arising under federal tax law, and she also knew that this reporting would result in a material understatement of her clients' federal income tax liability.

56. Accordingly, because Mills conduct falls squarely within 28 U.S.C. § 7408(c)(1) and injunctive relief is appropriate to prevent recurrence of this conduct, Mills should be permanently enjoined from preparing any returns that improperly claim or inflate a claim to a credit or claim false or inflated deductions.

**COUNT III:
INJUNCTION UNDER 26 U.S.C. §7402 FOR UNLAWFUL
INTERFERENCE WITH THE ENFORCEMENT OF INTERNAL REVENUE LAWS**

57. The United States incorporates by reference the allegations contained in paragraphs 1 through 56.

58. 26 U.S.C. § 7402(a) authorizes a district court to render judgments and decrees as may be necessary or appropriate for the enforcement of internal revenue laws.

59. As described above in paragraphs 7 through 34, Mills has repeatedly and continually engaged in conduct that interferes substantially with the administration and enforcement of internal revenue laws.

60. If Mills continues to act as a tax return preparer, her conduct will result in irreparable harm to the United States, and the United States has no adequate remedy at law.

61. The harm to the United States without the permanent injunction outweighs any harm to Mills if the Court enters the permanent injunction.

62. Mills' conduct has caused and will continue to cause substantial tax losses to the United States Treasury, much of which may be undiscovered and unrecoverable. Moreover unless Mills is enjoined from preparing returns, the IRS will have to devote substantial and unrecoverable time and resources examining her clients individually to detect future schemes, and to collect additional liability arising as a result of these schemes.

63. Although a permanent injunction would prevent Mills from preparing any tax returns, such an occurrence would only be a direct result of her own fraudulent actions in preparing a large volume of erroneous returns claiming fraudulent credits. Moreover, because Mills' business and income is premised largely on the preparation of fraudulent income tax

returns, this is not an interest that the Court should even weigh in deciding whether to issue a permanent injunction. Finally, the irreparable harm to the United States without the injunction far outweighs any harm the injunction might cause Mills. Mills will be able to pursue other financial endeavors to support herself, but the United States cannot recover the additional moneys lost if Mills is allowed to continue preparing tax returns.

64. The public interest strongly favors permanently enjoining Mills from preparing tax returns so as to put a stop to her abusive scheme, which has thus far claimed more than \$3 million in false credits. The public is best served by having only ethical and honest tax return preparers in business. Permanently enjoining Mills would also ensure that members of the public are not unknowingly subject to her fraudulent return preparation practices, which makes it more likely that the innocent taxpayers will be audited by the IRS, owe additional taxes, interest and penalties, and face collection actions until those amounts are paid in full.

65. The public interest is also served by having each person voluntarily pay the full amount of taxes that they owe and by having the government collect the full amount of taxes to which it is entitled. This prevents those people whose tax returns are correctly prepared from shouldering a greater portion of the tax burden at the expense of people whose tax returns were fraudulently prepared.

66. The United States is entitled to injunctive relief under 26 U.S.C. § 7402(a), and the Court should permanently enjoin Mills from engaging in conduct subject to penalty under 26 U.S.C. §§ 6694, 6695, and 6701 and that otherwise substantially interferes with the enforcement and administration of the internal revenue laws.

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

A. That the Court find that Lakeshia Michelle Mills d/b/a Willis Tax Service has repeatedly and continually engaged in conduct subject to penalty under 26 U.S.C. §§ 6694 and 6695 and that injunctive relief is appropriate under 26 U.S.C. § 7407 to prevent recurrence of that conduct;

B. That the Court find that Mills d/b/a Willis Tax Service has repeatedly and continually engaged in conduct subject to penalty under 26 U.S.C. § 6701 and that injunctive relief is appropriate under 26 U.S.C. § 7408 to prevent recurrence of that conduct;

C. That the Court find that Mills d/b/a Willis Tax Service has repeatedly and continually engaged in conduct that substantially interferes with the proper enforcement and administration of the internal revenue laws, and that injunctive relief against Mills is appropriate to prevent the recurrence of that conduct pursuant to 26 U.S.C. § 7402(a);

D. That the Court enter a permanent injunction prohibiting Mills d/b/a/ Willis Tax Service or any other person, including businesses, working in concert or participation with her from directly or indirectly:

(1) preparing, filing, assisting in the preparation or filing of, or directing the preparation of federal income tax returns, amended returns, or other tax-related documents and forms, including any electronically-submitted tax returns or tax-related documents, for any entity or person other than herself;

(2) preparing, filing, assisting in the preparation or filing of, or directing the

preparation of federal tax returns that she knows will result in the understatement of any tax liability or the overstatement of federal tax refunds;

(3) engaging in conduct subject to penalty under 26 U.S.C. §§ 6694, 6695, 6700, and 6701; and

(4) engaging in conduct that substantially interferes with the proper administration and enforcement of the tax laws;

E. That the injunction further require Mills:

(1) At her own expense, to send by certified mail, return receipt requested, a copy of the final injunction entered against her in this action, as well as a copy of the Complaint setting forth the allegations as to how Mills fraudulently prepared federal income tax returns, to each person for whom she prepared federal income tax returns or any other federal tax forms after January 1, 2010;

(2) To turn over to the United States copies of all returns or claims for refund that she prepared after January 1, 2010;

(3) To turn over to the United States a list with the name, address, telephone number, email address, and social security number or other taxpayer identification number of all customers for whom she prepared returns after January 1, 2010;

(4) To file a sworn statement with the Court evidencing her compliance with the foregoing directives within forty-five (45) days of entry of the final injunction in this action; and

(5) To keep records of her compliance with the foregoing directives, which may be produced to the Court, if requested, or the United States pursuant to paragraph F, below;

F. That the Court enter an order allowing the United States to monitor Mills' compliance with the injunction, and to engage in post-judgment discovery in accordance with the Federal Rules of Civil Procedure; and

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

Respectfully submitted,

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