



any person or entity other than himself or herself;

b. Appearing as a representative on behalf of any person or organization whose tax liabilities are under examination or investigation by the Internal Revenue Service;

c. Preparing or filing, or assisting in the preparation or filing of tax returns or other related forms or documents for others;

d. Filing (or helping or soliciting others to file) tax returns for others through the Internal Revenue Service E-File program or any other IRS service or program by which one electronically files tax returns;

e. Seeking permission or authorization (or helping or soliciting others to seek permission or authorization) to file tax returns for others through the Internal Revenue Service E-File program or any other IRS service or program by which one electronically files tax returns;

f. Instructing or advising customers, or assisting in the instruction or advice to customers to understate their federal tax liabilities;

g. Engaging in any activity subject to penalty under I.R.C. §§ 6694, 6695, 6700, 6701, or any other penalty provision in the Internal Revenue Code;

h. Engaging in conduct designed or intended to, or having the effect of, obstructing or delaying any Internal Revenue Service investigation or audit; and

i. Engaging in any other conduct that interferes with the proper administration and enforcement of the internal revenue laws.

2. The United States may engage in full post-judgment discovery to monitor compliance with the injunction.

3. The Court shall retain jurisdiction over these defendants and this action for purpose of implementing and enforcing the final judgment and any additional orders necessary and appropriate to the public interest.

BY THE COURT:

/s/ Harvey Bartle III

C.J.