

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

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	Case No. 4:23-cv-79
)	
v.)	
)	
JENNIFER MURLEY,)	
)	
Defendant.)	
_____)	

PARTIAL DEFAULT JUDGMENT AND PERMANENT INJUNCTION

The United States filed this action to enjoin Defendant Jennifer Murley, and anyone else in active concert or participation with her, from acting as federal tax return preparers and engaging in related activities. *See* ECF No. 1. Murley did not answer the United States Complaint, and the Clerk entered default against Murley on March 17, 2023. The Court then granted the United States leave to seek partial default judgment as to Counts I, II, and III, of its complaint. Order, ECF No. 8.

After reviewing the entirety of the record—including the Clerk’s entry of default and the United States’ motion for partial default judgment—the Court finds that Murley has engaged and is engaging in conduct interfering with the enforcement of the internal revenue laws, and that injunctive relief under 26 U.S.C. §§ 7402(a), 7407, and 7408, is appropriate to stop the conduct by Murley.d

Accordingly, the Court Orders that the United States' Motion for Partial Default Judgment is GRANTED. The clerk shall enter Partial Default Judgment and Permanent Injunction against Murley.

IT IS FURTHER ORDERED that, under 26 U.S.C. §§ 7402(a), 7407, and 7408, Jennifer Murley and all those in active concert or participation with Murley, are permanently enjoined and PROHIBITED from directly or indirectly:

- (1) Acting as federal tax return preparer or requesting, assisting in, or directing, the preparation or filing of federal tax returns, amended returns, or other related documents or forms for any person or entity other than themselves unless the entity for which a return is being prepared is an entity for which Murley is legally obligated to file a tax return;
- (2) Preparing, or assisting in preparing, federal tax returns that she knows 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 in, investing in, 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 anyone with cheat sheets, memoranda, directions, instructions, or manuals, pertaining to the preparation of federal tax returns;
- (5) Applying for, directing others to apply for, maintaining, assigning, holding, using, leasing, or obtaining a PTIN or an EFIN;
- (6) Advising, counseling, or instructing anyone, including the Sub-preparers, for compensation or otherwise regarding substantive tax law or the preparation of federal tax returns;
- (7) Engaging in any other activity subject to penalty under 26 U.S.C. §§ 6694, 6695, 3700, or 6701;

- (8) Advertising tax return preparation services through any medium, including print, online, and social media;
- (9) Referring any taxpayer to a tax preparation firm or to a tax return preparer (including to a Sub-preparer), or otherwise suggesting that a taxpayer use any given tax preparation firm or any tax return preparer;
- (10) Selling, providing access, or otherwise transferring to any person a list of tax preparation customers, that Murley generated by her tax return preparation activities;
- (11) Using Umbrella Financial Services LLC, JMJM Services LLC, CT ITR JM, CT - ITR, CT ITR or any other business entity, to (a) assist in the operation of a tax preparation business; (b) assist in the preparation of federal tax returns, and (c) receive federal tax refunds, whether directly from the IRS, or indirectly from Santa Barbara or from Umbrella;
- (12) Collecting or gathering Forms W-2 and Forms 1099 from taxpayers or from customers who want to have a federal tax return prepared;
- (13) Opening, applying for, maintaining, or having signature authority over a bank account that receives funds from Santa Barbara Tax Products Group, LLC or from an equivalent tax refund processing service, unless the funds are Murley's own tax refund;
- (14) Working, or operating any business, in the same office or office suite that also contains any part of a business whose activity at that office or office suite is to file, prepare, advise, or assist in the preparation of documents relating to a matter material to the internal revenue laws, including federal tax returns, amended federal tax returns and related documents, for any person for compensation.

IT IS FURTHER ORDERED that Murley, at her own expense, within 30 days of this Court's Order SHALL

- (15) Send, at her own expense, by certified mail, return receipt requested, within 45 days of the Court's order, and, if an email address is known also by email, to (a) all persons for whom Murley has prepared federal tax returns, amended tax returns, or claims for refund since January

2018; and (b) all employees or independent contractors that Murley has had since January 2018, a copy of the order of permanent injunction, with no other enclosures, unless the enclosure(s) is approved by the Department of Justice;

- (16) Turn over to the United States copies of all returns, other tax forms, and claims for refund that Murley, prepared after January 1, 2018;
- (17) Provide the United States a list of the names, Social Security numbers, addresses, phone numbers, and email addresses of each person for whom Murley, prepared tax returns, other tax forms, or claims for refund after January 1, 2018;

IT IS FURTHER ORDERED that Murley, at her own expense, SHALL

- (18) Prominently and continuously from at least January 1 through April 16 of each year post a copy of its permanent injunction (with dimensions of at least 12 by 24 inches) at all the locations where Murley conducts business, including, but not limited to, the following locations:
 - 1) 123 North St, Addison, TX 75001.
 - 2) 123 Down St, Waco, TX 76710;
 - 3) 4303 South Bowen Rd, Ste 121, Arlington, TX 76016;
 - 4) 809 West Park, Arlington, TX 76010;
 - 5) 1919 McKinney Ave Ste 2016, Dallas, TX 75201;
 - 6) 1144 C W Pioneer Pkwy, Arlington, TX 76013; and
 - 7) 809 West Park, Arlington, TX 76010.
- (19) Post on all social media accounts and websites used to advertise her tax preparation services: "Jennifer Murley has been permanently enjoined 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, Tax Division's website for further information." This statement will include a hyperlink, which will be provided by

counsel for the United States, to any press release regarding the injunction that the Department of Justice may issue. Jennifer Murley, shall not deactivate any such social media accounts for at least one year after entry of judgment;

- (20) Surrender to the Secretary of the Treasury or her delegate all PTINs held by, assigned to, or used by her pursuant to 26 U.S.C. § 6109, as well as any EFINs held by, assigned to, or used by her;
- (21) Within 45 days of the Court's order, file a declaration, signed under penalty of perjury, confirming that she has received a copy of the Court's order and has timely complied with the terms described in paragraphs (15) through (18), of the Order;
- (22) Keep records of her compliance with the foregoing directives, which may be required to be produced to the Court, if requested, or to the United States, pursuant to paragraph (23), below.

IT IS FINALLY ORDEREDED that the United States is permitted to

- (23) Monitor Murley's compliance with the injunction; and
- (24) Engage in post-judgment discovery in accordance with the Federal Rules of Civil Procedure.

Entered this 5 day of May, 2023.


UNITED STATES DISTRICT JUDGE