

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff .

v

LANCE K BRADFORD, .

Defendant

Case No 2:24-cv-02133-GMN-MDC

DEMAND FOR FINAL JUDGMENT AND
PERMANENT INJUNCTION

OF

1 Plaintiff United States and Defendant Lance K Bradford have stipulated to entry of an agreed
2 order and final judgment of permanent injunction that resolves all of the United States' claims
3 against Bradford in this case, and the United States has moved the Court for entry of an order and
4 final judgment consistent with that stipulation For good cause shown, the Court grants that motion
5 and enters this order and final judgment as set forth below

6 A This Court has personal jurisdiction over Lance K Bradford This Court has subject matter
7 jurisdiction over this action pursuant to 28 U S C §§ 1331, 1340, and 1345, and 26 U S C
8 §§ 7402, 7407, and 7408

9 B Lance K Bradford has engaged in conduct subject to penalty under 26 U S C § 6694,
10 conduct subject to criminal penalty under the Internal Revenue Code, and fraudulent or
11 deceptive conduct which substantially interfered with the proper administration of the
12 Internal Revenue laws The Court finds that injunctive relief under 26 U S C § 7407 is
13 appropriate to prevent recurrence of that conduct, and that a narrower injunction which still
14 allows Bradford to engage in tax preparation activities would not be sufficient to prevent
15 the recurrence of such conduct

1 v C. Brad rd a ngag d in c nduct ubj ct t p nalty und r 26 U.S.C. § 6700 and § 6701
2 v and t C urt ind t at injuncti r li und r 26 U.S.C. § 7408 i appr priat t pr nt
3 v r curr nc t at c nduct.

4 v D. Brad rd a ngag d in c nduct int r ring wit t admini trati n and n rc mnt
5 t int rnal r nu law and t C urt ind t at injuncti r li und r 26 U.S.C. §
6 v 7402(a) i n c ary and appr priat t pr nt r curr nc t at c nduct.

7 v E. Brad rd a ngag d in c nduct t at r nd r p rman nt injuncti r li pr p r und r 26 v
8 v U.S.C. §§ 7402, 7407, and 7408 and t C urt' quitabl p w r .

9 v F. Pur uant t 26 U.S.C. §§ 7402, 7407, and 7408, Lanc K. Brad rd, and any p r n in
10 v acti c nc rt r participati n t r wit , i r by p rman ntly nj in d r m, dir ctly r
11 indir ctly:

12 v 1. Pr paring, a i ting in, dir cting, r up r i ing t pr parati n r iling
13 d ral tax r turn , am end d tax r turn , r t r r lat d d cum nt r rms
14 including any l ctr nically ubmitt d tax r turn r tax-r lat d d cum nt , r
15 any p r n r ntity r any n t r t an imsl r t r t an r an ntity r
16 w ic a al gal bligati n t il a tax r turn.

17 2. Tran rring, lling, r a igning cu t m r li t and/ r cu t m r in rmati n
18 r cu t m r LL Brad rd & C mpany and any it pr d c r .

19 v 3. Engaging in acti ity ubj ct t p nalty und r 26 U.S.C. §§ 6694, 6695, 6700,
20 and/ r 6701 r ngaging in c nduct t at ub tiantially int r r wit t pr p r
21 admini trati n and n rc mnt t tax law . v

1 U 4. Make a name, write or oral, or cause or encourage other to
2 U make a name, write or oral, have represented a of the terms of the
3 U order of judgment and judgment in his case.

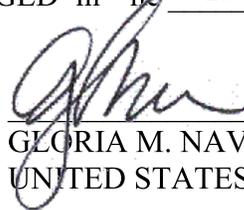
4 U G. The said State is permitted to exercise full post-judgment discovery and
5 U monitor compliance with the order of judgment and judgment in his case, in accordance
6 U with the Federal Rule of Civil Procedure.

7 U H. This Court shall retain jurisdiction over his case for the purpose of implementing and
8 U enforcing the order of judgment.

9 U I. Pursuant to Rule 65(d)(2) of the Federal Rule of Civil Procedure, each of the order of
10 U judgment and judgment in his case binds the following who receive actual notice of it by
11 U personal service or otherwise:

- 12 U a. Defendant Lance K. Bradford;
- 13 U b. Any officer, agent, servant, employee, or advisor of Defendant Lance K.
14 U Bradford; U
- 15 U c. Other persons who are in active contact or participation with anyone described in
16 U (a) or (b) above.

SO ORDERED, DECREED, AND ADJUDGED this the 25 day of November, 2024.



 GLORIA M. NAVARRO
 UNITED STATES DISTRICT JUDGE U