Case 4 of Ever 171 HEA - Document 4.2 - Filed 10/09/2007 - Page 1 of 4

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Case No. 07-1471-HEA
V.)	
)	
)	
WILLIAM S. REED, individually and)	
dba as Asset Protection Group, Inc.,)	
)	
Defendant.)	

STIPULATED ORDER OF PERMANENT INJUNCTION

The United States of America has filed a complaint for permanent injunction under 26 U.S.C. §§ 7408 and 7402(a) against William S. Reed, individually and dba as Asset Protection Group, Inc. The complaint seeks to enjoin Reed from promoting a tax-fraud scheme that helps customers evade the assessment and collection of federal tax liabilities.

Defendant, without admitting any of the allegations in the complaint except as to jurisdiction, waives the entry of findings of fact and conclusions of law under Rules 52 and 65 of the Federal Rules of Civil Procedure and the Internal Revenue Code, 26 U.S.C. §§ 7408 and 7402(a). Defendant understands that this permanent injunction constitutes the final judgment in this matter, and waives the right to appeal from this judgment. Defendant consents to the entry of this permanent injunction without further notice and agrees to be bound by its terms. Defendant further understands and agrees that the Court will retain jurisdiction over this matter for the purpose of implementing and enforcing this injunction and understands that if he violates the injunction, he may be subject to civil and criminal sanctions for contempt of court. The parties agree that entry of this permanent injunction

Case 4.07-cv-01471-HEA Document 4-2

Filed 10/09/2007 . Page 2 of 4

neither precludes the Internal Revenue Service from assessing penalties against Reed for asserted violations of the Internal Revenue Code nor precludes Reed from contesting any such penalties.

ORDER

IT IS HEREBY ORDERED that defendant William S. Reed, individually and dba as Asset Protection Group, Inc., and his representatives, agents, servants, employees, and anyone in active concert or participation with him, is PERMANENTLY ENJOINED, pursuant to Internal Revenue Code (I.R.C.) (26 U.S.C.) §§ 7408 and 7402, from directly or indirectly:

- engaging in activity subject to penalty under IRC § 6700, including a. organizing or selling a plan or arrangement and making a statement regarding the securing of any tax benefit of participating in a plan that he knows or has reason to know is false or fraudulent as to any material matter;
- assisting in the creation and administration of corporations or other state-law b. or international entities;
- assisting in the filing of fraudulent liens; C.
- assisting in the creation of hidden bank accounts, nominally maintained in the d. name of corporations or other state-law or international entities; and
- engaging in conduct that substantially interferes with the proper e. administration or enforcement of the internal revenue laws.

IT IS FURTHER ORDERED that Defendant Reed must mail (and also by e-mail, if an address is known) a copy of this injunction and a copy of the complaint to all individuals and entities for whom he has established or assisted in establishing bank accounts (including international bank accounts), corporations (including international corporations), or liens since January 4, 2007, and to inform them of the Court's permanent injunction order and enclose a copy of the permanent injunction order against him. Defendant must mail the copies within 15 days of the date of this Order and must file with the Court a swom

2

Case 4.07-cv-01471-HEA - Document 4-2 - Filed 10/09/2007

Page 3 of 4

certificate stating that he has complied with this requirement. The mailings shall include a cover letter in a form either agreed to by counsel for the United States or approved by the Court, and shall not include any other documents or enclosures;

IT IS FURTHER ORDERED that Defendant Reed produce a list to counsel for the United States within 15 days of the date of this Order identifying every bank account (including international bank accounts) and corporation (including international corporations) he has established or assisted in establishing for customers since January 4, 2007;

IT IS FURTHER ORDERED that Defendant Reed produce a list to counsel for the United States within 15 days of the date of this Order identifying every lien he has established or assisted in establishing since January 4, 2007;

> 3 2583509.3

Sase 4:07 cv-01471-HEA | Document 4-2 |

Filed 10/09/2007

Page 4 of 4

IT IS FURTHER ORDERED that the Court retains jurisdiction to enforce this injunction and the United States may engage in post-judgment discovery to monitor Reed's

compliance with this injunction.

Seen and Agreed:

William Reed

9716 Royal Lamb Drive Las Vegas, Nevada 89145

Defendant

Prepared by:

Michael J. Roessner

Trial Attorney, Tax Division U.S. Department of Justice

P.O. Box 7238

Washington, DC 20044

Tel: (202) 305-3227

Attorney for the United States

eonard J. Frankel

Frankel, Rubin, Bond, Dubin, Siegel & Klein, P.C.

231 S. Berniston Avenue

Suite 1111

St. Louis, Missouri 63105

Telephone: (314) 725-8000

(314) 726-5837 Attorney for William Reed

SO ORDERED this // the day of / Clarken

TED STATES DISTRICT JUDGE