

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Civil No. CIV-04-0037-HE
)	
JOSEPH E. WOLF, <i>et al.</i> ,)	
)	
Defendants.)	

FINAL JUDGMENT OF PERMANENT INJUNCTION

Plaintiff, the United States of America, has filed a Complaint for Permanent Injunction in this matter against Defendants Joseph Wolf, Cecil Fisher, Eric Wolf, and Louise Qualls (collectively, the Individual Defendants).

The Individual Defendants waive any right they may have to appeal from this Final Judgment of Permanent Injunction.

The Individual Defendants state that they enter into this Final Judgment of Permanent Injunction voluntarily.

The Individual Defendants acknowledge that entry of the Final Judgment of Permanent Injunction neither precludes the Internal Revenue Service from assessing taxes or penalties against them for asserted violations of the Internal Revenue Code, nor does it preclude the Individual Defendants from contesting such taxes or penalties.

The Individual Defendants agree that this Court shall retain jurisdiction over them for the purpose of implementing and enforcing the Final Judgment of Permanent Injunction.

The Individual Defendants acknowledge that a Final Judgment for monetary damages has been or may soon be entered against some or all of the Corporate Defendants. The Individual

Defendants agree that they will cooperate, in good faith, with any discovery in aid of execution of the Final Judgment against the Corporate Defendants, including depositions, interrogatories, and document requests.

DEFINITIONS

1. A professional employer organization (PEO) contracts with other businesses to handle the businesses' human resource matters. The PEO pays the wages and employment taxes for the businesses' employees out of the PEO's accounts; and reports, collects and deposits employment taxes with federal authorities using the PEO's employer identification number.

2. A payroll service company contracts with other businesses to handle the businesses' payroll processing, tax filing, benefit packages, and/or human resource management. All tax forms are filed under the employer identification number of the client businesses.

3. A temporary agency supplies temporary or contract workers to businesses. The temporary agency locates, hires, and employs the temporary or contract workers. Accordingly, all tax forms for the temporary or contract workers are filed under the employer identification number of the temporary agency. When used in the context of this Order, temporary agency includes a technical contractor or any other company that provides temporary or contract workers to other businesses.

4. The term Corporate Defendants refers to Legion Enterprises, Inc., A to Z Staffing Services, Inc., Benefit Marketing, Inc., Employer's Administrative and Payroll Services, Inc., Global Staffing, Inc., National Staffing, Inc., Nationwide Staffing Services, Inc., Professional Employer's Management, Inc., Select Staffing, Inc., SSI of America, Inc., SSI of Bethany, Inc., SSI of OKC, Inc., SSI Personnel, Inc., SSI Staffing, Inc., Staff Specialties, Inc., Summit Staffing

Services, Inc., Support Staffing Services, Inc., Tecumseh Management, Inc., The Corporate Direct, Inc., The T.S.I. Group, Inc., Titan Management, Inc., Total Staffing Services, Inc., TSI Builders, Inc., TSI Installations, Inc., TSI Installers and Erectors, Inc., TSI Medical, Inc., TSI of Peachtree, Inc., TSI Temps, Inc., and Vontres Staffing Services, Inc.

FINDINGS OF FACT/CONCLUSIONS OF LAW

5. The Individual Defendants waive the entry of findings of fact and conclusions of law under Rule 52 of the Federal Rules of Civil Procedure and 26 U.S.C. § 7402.

INJUNCTION ORDER

NOW, THEREFORE, it is accordingly, ORDERED, ADJUDGED AND DECREED that:

1. The Court has jurisdiction over this action pursuant to §§ 1350 and 1345 of Title 28 of the United States Code, and § 7402 of the Internal Revenue Code of 1986, as amended (26 U.S.C.) (the “Code”).

2. The Individual Defendants must dissolve, close, and otherwise stop operating all professional employer organizations, temporary agencies, and payroll service companies that they own, manage, and/or control.

3. The Individual Defendants are restrained and enjoined from volunteering for, working for, consulting for, or being in anyway affiliated or associated, directly or indirectly, with any and all professional employer organizations, temporary agencies, and payroll service companies. The Individual Defendants shall not, now or anytime hereafter, volunteer for, work for, consult for, or be in anyway affiliated or associated, directly or indirectly, with any and all professional employer organizations, temporary agencies, and payroll service companies.

4. Eric Wolf and Louise Qualls must file corporate income tax returns for Titan Management, Inc. and TSI Installers and Erectors, Inc. in accordance with the time schedule and terms previously outlined by this Court in its orders dated April 6, 2004 (Preliminary Injunction Order), June 8, 2004 (Order granting time extension), and October 18, 2004 (Order on motion for contempt) .

5. The Individual Defendants are restrained and enjoined from engaging in conduct that substantially interferes with the proper administration and enforcement of the internal revenue laws.

6. All of the Individual Defendants and their heirs, successors, assigns, agents and employees, are hereby restrained and enjoined from transferring funds or other property from any of the Corporate Defendants.

7. The Individual Defendants are restrained and enjoined from organizing or establishing any new corporation or other entity which is, in substance, a professional employer organization, payroll service company, or temporary agency. This prohibition includes, but is not limited to, serving as an organizer, owner, incorporator, officer, or director.

8. Notwithstanding this injunction order:

a. Cecil Fisher is not prohibited from providing insurance services to third parties unrelated to the defendants in this case.

b. Joseph Wolf is not prohibited from providing legal services as an attorney to third parties unrelated to the defendants in this case.

9. To facilitate monitoring compliance with this Injunction, for the next five years, each Individual Defendant must send the following to Karen Robinson, or some other IRS designee,

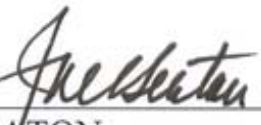
at Internal Revenue Service, 55 North Robinson; Mail Stop E:4137, Oklahoma City, Oklahoma 73102: (1) the name, address, and phone number of the person or entity for whom each Individual Defendant is working, unless the Individual Defendant is self-employed, in which case, the Individual Defendant should so state and (2) a job description of the work done by each Individual Defendant. This information must be provided to Ms. Robinson within **10 days** of the date of this Order. If the information changes over the ensuing five years, the Individual Defendant must submit the updates to Ms. Robinson within **10 days** of the change.

10. The United States is permitted to engage in post-judgment discovery to ensure compliance with this permanent injunction.

11. This Court shall retain jurisdiction of this action for the purpose of implementing and enforcing this Final Judgment and all additional decrees and orders necessary and appropriate for the public interest.

IT IS SO ORDERED.

Dated this 23rd day of December, 2004.



JOE HEATON
UNITED STATES DISTRICT JUDGE

Consented to by:

Dated: 11/23/04

/s/ William J. Bergner
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Dated: 11/22/04

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Attorney for Joseph Wolf and Cecil Fisher

Dated: 12/16/04

/s/ Hilarie E. Snyder
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