28

///

Doc. 4

Pursuant to the "STIPULATION FOR ENTRY OF FINAL JUDGMENT OF PERMANENT INJUNCTION AGAINST ROBERT L. CARDOZA" filed concurrently herewith:

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED:

- 1. The court has jurisdiction over defendant Robert L. Cardoza, and over the subject matter of this proposed action pursuant to 28 U.S.C. §§ 1340 and 1345 and 26 U.S.C. § 7402(a).
- 2. Pursuant to 26 U.S.C. §§ 7402, 7407 and 7408, Defendant Robert L. Cardoza:
 - a. is permanently enjoined from acting as a federal tax return preparer or requesting, assisting in, or directing the preparation or filing of federal tax returns or other tax forms or documents for any person or entity other than himself (or his spouse if he files a joint return);
 - b. is permanently enjoined from misrepresenting his experience or education as a tax return preparer;
 - c. consents, without further proceedings, to immediate revocation of any Preparer Tax Identification Number (PTIN) that is held by, or assigned to, or used by him pursuant to 26 U.S.C. § 6109;
 - d. consents, without further proceedings, to immediate revocation of any Electronic Filing Identification Number (EFIN) held by, assigned to, or used by him; and
 - e. is permanently enjoined from using, maintaining, obtaining, transferring, selling, or assigning any PTIN(s) and EFIN(s).
- 3. Defendant Robert L. Cardoza waives the entry of findings of fact and conclusions of law under Rules 52 and 65 of the Federal Rules of Civil Procedure and 26 U.S.C. §§ 7402, 7407 and 7408.

- 4. Defendant Robert L. Cardoza understands that this Final Judgment of Permanent Injunction will constitute the final judgment against him in this civil injunction action. Defendant Robert L. Cardoza waives any right he may have to appeal from this Final Judgment of Permanent Injunction.
- 5. Defendant Robert L. Cardoza consents to the entry of this Final Judgment of Permanent Injunction and agrees to be bound by its terms.
- 6. Entry of this Final Judgment of Permanent Injunction resolves only this civil injunction action, and neither precludes the government from pursuing any other current or future civil or criminal matters or proceedings, nor precludes Defendant Robert L. Cardoza from contesting his liability or guilt in any other matter or proceeding.
- 7. Nothing in this Final Judgment of Permanent Injunction precludes the Internal Revenue Service from assessing taxes, interest, or penalties against him for asserted violations of the Internal Revenue Code, nor precludes Defendant Robert L. Cardoza from contesting such taxes, interest, or penalties.
- 8. This Court shall retain jurisdiction over the defendant, Robert L. Cardoza, and over this action to enforce this Final Judgment of Permanent Injunction and the United States shall be entitled to conduct discovery to monitor Defendant Robert L. Cardoza's compliance with the terms of this injunction entered against him.

///

///

///

26

27

28

1	9. Pursuant to Rule 65(d)(2) of the Federal Rules of Civil Procedure, this	
2	Final Judgment of Permanent Injunction binds the following who receive actual	
3	notice of it by personal service or otherwise:	
4	a. the defendant, Robert L. Cardoza;	
5	b. Robert L. Cardoza's officers, agents, servants, employees, and	
6	attorneys; and	
7	c. other persons who are in active concert or participation with	
8	anyone described in (a) or (b) above.	
9	IT IS SO ORDERED.	
10		RONALD S.W. LEW
11	DATED: <u>9/18/2014</u>	
12		HON. RONALD S.W. LEW SENIOR U.S. DISTRICT JUDGE
13		SENIOR U.S. DISTRICT JUDGE
14	Despectfully Cubmitted	
15	Respectfully Submitted,	
16	STEPHANIE YONEKURA Acting United States Attorney SANDRA R. BROWN Assistant United States Attorney Chief, Tax Division	
17		
18	Chief, Tax Division GAVIN GREENE	
19	Assistant United States Attorney	7
20	/s/	
21	RICHARD G. ROSE	
22	Trial Attorney, Tax Division U.S. Department of Justice	
23 24	O.S. Department of Justice	
	Attorneys for Plaintiff	
25 26	United States of America	
20 27		
28		