



1 liens were filed solely to retaliate against these IRS employees for their good-faith efforts to  
2 enforce the tax laws against the Defendants.

3 (4) Plaintiff has demonstrated that the entry of this injunction is necessary and  
4 appropriate to the enforcement of the internal revenue laws. 26 U.S.C. § 7402(a).

5 (5) In addition, Plaintiff has demonstrated that continued filings of frivolous liens  
6 against its officers would cause it irreparable harm, because federal officers who face personal  
7 reprisal through encumbrance of their property and damage to their credit record may be unable  
8 to enforce the internal revenue laws vigorously and evenhandedly.

9 (6) Furthermore, Plaintiff has demonstrated that it has no adequate remedy at law  
10 with respect to future frivolous lien filings, because it would suffer the irreparable harm  
11 described above during the time in which it would be required to apply to a court to have the lien  
12 filings stricken.

13 (7) The equities weigh in favor of Plaintiff because the Defendants have no basis for  
14 filing nonconsensual liens against federal officers. Furthermore, an injunction is in the public  
15 interest because it will help ensure that federal officers can apply the internal revenue laws free  
16 of retaliation and harassment by Defendant.

17 WHEREFORE, it is hereby ORDERED, ADJUDGED, and DECREED as follows:

18 (1) It is hereby ORDERED that James C. Castle, a.k.a. J. Chris Castle, and Lara  
19 Karakasevic, as well as any person acting on their behalf, shall be, and hereby are,  
20 PERMANENTLY ENJOINED from filing any notices of lien, recording any documents, or  
21 otherwise taking any action in the public records which purports to name a federal officer as a  
22 debtor, appoint a federal officer as a trustee, or encumber the rights or the property of any federal  
23 officer. The injunction in this paragraph shall not apply if James C. Castle, a.k.a. J. Chris Castle,  
24 or Lara Karakasevic, shall first have prior permission to record the document from a United  
25 States District Court, which permission shall also be recorded.

26 (2) For the purposes of the preceding paragraph, "federal officer" shall mean any  
27 officer, employee, or agent of the United States or any of the agencies of the United States, or  
28 any judge, magistrate judge, judicial officer, or judicial employee of the United States, regardless  
of whether the officer, employee, or agent is named personally, in his or her official capacity, or

1 in any other capacity.

2 (3) The Defendants are cautioned and advised that any violation of this injunction  
3 imposed by this Judgment may result in the imposition of appropriate civil or criminal sanctions  
4 as well as constituting contempt of court.

5 (4) It is hereby ORDERED that the UCC Financing Statement Filing Number 09-  
6 7212189867, filed by Defendant James Castle with the Secretary of State for the State of  
7 California on October 23, 2009, is declared NULL, VOID, and of NO LEGAL EFFECT and  
8 shall be stricken and permanently EXPUNGED from the records of the Secretary of State for the  
9 State of California.

10 (5) It is hereby ORDERED that the UCC Financing Statement Filing Number 09-  
11 7213771724, filed by Defendant James Castle with the Secretary of State for the State of  
12 California on November 9, 2009, is declared NULL, VOID, and of NO LEGAL EFFECT and  
13 shall be stricken and permanently EXPUNGED from the records of the Secretary of State for the  
14 State of California.

15 (6) It is hereby ORDERED that the UCC Financing Statement Filing Number 10-  
16 7225380533, filed by Defendants James Castle and Lara Karakasevic with the Secretary of State  
17 for the State of California on March 12, 2010, is declared NULL, VOID, and of NO LEGAL  
18 EFFECT and shall be stricken and permanently EXPUNGED from the records of the Secretary  
19 of State for the State of California.

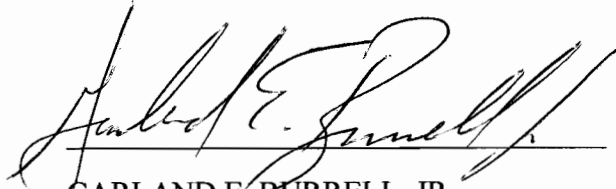
20 (7) It is hereby ORDERED that the UCC Financing Statement Filing Number 10-  
21 7225386094, filed by Defendants James Castle and Lara Karakasevic with the Secretary of State  
22 for the State of California on March 12, 2010, is declared NULL, VOID, and of NO LEGAL  
23 EFFECT and shall be stricken and permanently EXPUNGED from the records of the Secretary  
24 of State for the State of California.

25 (8) It is hereby ORDERED that the UCC Financing Statement Amendment, Filing  
26 Number 10-72367455, filed by Defendants James Castle and Lara Karakasevic with the  
27 Secretary of State for the State of California on June 30, 2010, is declared NULL, VOID, and of  
28 NO LEGAL EFFECT and shall be stricken and permanently EXPUNGED from the records of  
the Secretary of State for the State of California.

1 (9) The United States may record this Judgment in the public records as necessary in  
2 order to effectuate paragraphs (1) through (8) of this Judgment.

3  
4 IT IS SO ORDERED.

5  
6 DATED: 8-22-11

7   
8 GARLAND E. BURRELL, JR.  
9 UNITED STATES DISTRICT JUDGE

10  
11 Presented on June 3, 2011 by:

12 BENJAMIN B. WAGNER  
13 United States Attorney

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