

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS

United States,)
)
Plaintiff,)
)
v.)
)
)
Jose Alberto Lares, aka Jose)
Lares-Vargas, dba Dinero Rapido Tax)
Services fka Income Tax Dinero)
Rapido,)
)
Defendant.)

Case No. 10-1072-KHV-DJW

Stipulated Order for Permanent Injunction

The United States has filed a complaint for a permanent injunction seeking to bar Jose Alberto Lares from preparing federal tax returns. Without admitting any of the allegations in the complaint, Lares consents to the entry of this permanent injunction without further notice and agrees to be bound by its terms. Lares also understands that this permanent injunction will remain in place absent further court order. Lares further understands and agrees that the Court will retain jurisdiction over this matter for the purpose of implementing and enforcing this permanent injunction and understands that if he violates this permanent injunction, he may be subject to civil and criminal sanctions for contempt of court. The parties agree that entry of this permanent injunction neither precludes the Internal Revenue Service from assessing penalties against Lares for asserted

violations of the Internal Revenue Code nor precludes Lares from contesting any such penalties.

THEREFORE, the Court ORDERS that Jose Lares, individually and doing business as Dinero Rapido Tax Services, his agents, servants, employees, independent contractors, and those persons in active concert or participation with them who receive actual notice of this Order is permanent enjoined from:

1. Preparing or assisting in the preparation or filing of any federal tax return, amended return, or claim for refund, for any person or entity other than himself (or his spouse, filing a joint return);
2. Engaging in conduct subject to penalty under 26 U.S.C. § 6694, including preparing federal tax returns or claims for refund that include unrealistic or frivolous positions;
3. Engaging in conduct subject to penalty under 26 U.S.C. § 6701, including preparing or assisting in the preparation of a document related to a matter material to the internal revenue laws that includes a position he knows will (if so used) result in an understatement of another person's tax liability;
4. Engaging in any conduct that interferes with the proper administration and enforcement of the internal revenue laws; and
5. Misrepresenting any of the terms of this Order.

The Court also ORDERS Lares to mail, at his own expense, a copy of this injunction order within 14 days of the entry of this Order to all persons and entities for whom he prepared any federal income tax returns, amended returns, refund claim, or other federal tax-related documents since January 1, 2007. Lares shall file a certificate of compliance, signed under penalty of perjury, with the Court within 15 days of the entry of this Order.

The Court also ORDERS Lares to turn over to the United States within 14 days of the entry of this Order a complete list of all persons for whom he prepared (or helped to prepare) any federal tax return, amended return, or refund claim since January 1, 2007, such list to include each such person's name, address, phone number, e-mail address, social security number or employer identification number, and the tax period(s) to which or for which such return, amended return, or refund claim relates. The list shall include all customers whose returns Lares helped to prepare, even if those returns were filed listing someone else as preparer or listing someone else's social security or employer identification number as preparer, or listing someone else's electronic filing number.

The Court also ORDERS Lares to provide a copy of this order to all of Lares's agents, servants, employees, and independent contractors, including any person employed by or providing services on the behalf of Dinero Rapido Tax Services, within 7 days. Lares shall also provide to counsel for the United States within 14 days an

acknowledgment of receipt of this Order signed and dated by Lares and by each person to whom Lares provided a copy of this Order in compliance with this paragraph.

In order to monitor Lares's compliance with this permanent injunction, the United States may conduct formal discovery using the procedures prescribed by Fed. R. Civ. P. 30, 31, 33, 34, 36, and 45 or as otherwise provided in the Federal Rules of Civil Procedure.

May 26,
Dated: ~~April~~, 2010

s/ Kathryn H. Vratil

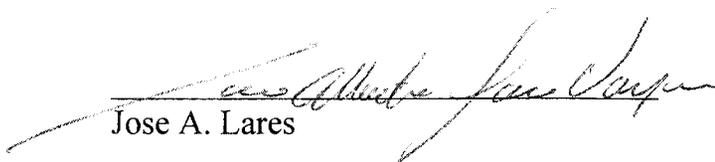
Kathryn H. Vratil
Chief Judge of District Court

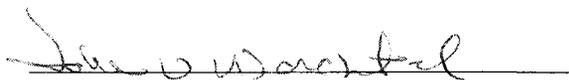
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