

ENTERED

January 11, 2023

Nathan Ochsner, Clerk

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

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| <p>UNITED STATES OF AMERICA,</p> <p>Plaintiff,</p> <p>v.</p> <p>JEANNETTE ESTEPH VILLARREAL AKA JEANNETTE VILLARREAL-CORTEZ AKA JEANNETTE ESTEPH CORTEZ; LEANNETTE MARIE VILLARREAL; and ZEANNETTE LIANNE SALAZAR.</p> <p>Defendants.</p> | <p>CIVIL NO: 2:23-cv-00006</p> |
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ORDER ENTERING PERMANENT INJUNCTION AGAINST JEANNETTE VILLARREAL, LEANNETTE VILLARREAL, AND ZEANNETTE SALAZAR

Having considered the Complaint (ECF No. 1) and the Stipulations for Entry of Permanent Injunction (ECF Nos. []), the Court finds as follows:

1. The United States of America filed a Complaint seeking a permanent injunction pursuant to 26 U.S.C. §§ 7402(a), 7407, and 7408 against Defendants Jeannette Esteph Villarreal a/k/a Jeannette Villarreal-Cortez a/k/a Jeannette Esteph Cortez (“Jeannette Villarreal”), Leannette Marie Villarreal (“Leannette Villarreal”), and Zeannette Lianne Salazar (“Zeannette Salazar,” and collectively with Jeannette Villarreal and Leannette Villareal, the “Defendants”).

2. The Court has jurisdiction pursuant to 28 U.S.C. §§ 1331, 1340 and 1345, and 26 U.S.C. §§ 7402(a) and 7407.

3. Defendants Jeannette Villarreal, Leannette Villarreal, and Zeannette Salazar, without admitting any of the allegations in the complaint, waive the entry of findings of fact and

conclusions of law under Federal Rules of Civil Procedure 52 and 65, consent to the entry of this permanent injunction, and agree to be bound by its terms.

4. Defendants Jeannette Villarreal, Leannette Villarreal, and Zeannette Salazar further understand and agree that:

- a. This permanent injunction is entered pursuant to Federal Rule of Civil Procedure 65 and is the final judgment in this matter;
- b. Defendants Jeannette Villarreal, Leannette Villarreal, and Zeannette Salazar waive the right to appeal from this permanent injunction;
- c. The Court will retain jurisdiction over this matter for the purpose of implementing and enforcing this permanent injunction;
- d. If Defendants Jeannette Villarreal, Leannette Villarreal, and/or Zeannette Salazar violate this permanent injunction, the violating party may be subject to civil and criminal sanctions for contempt of court;
- e. In addition to the permanent injunction's specific directives, Defendants Jeannette Villarreal, Leannette Villarreal, and Zeannette Salazar have an obligation to preserve all pertinent documents in their possession, including tax returns, informational returns, correspondence, working papers, or any other documents connected to their tax preparation activities, whether stored electronically or on paper, as required by the Internal Revenue Code;
- f. The United States may conduct full post-judgment discovery to monitor Defendants Jeannette Villarreal, Leannette Villarreal, and Zeannette Salazar's compliance with this permanent injunction; and

- g. Entry of this permanent injunction resolves only this civil action, and neither precludes the United States from pursuing any other current or future civil or criminal matters or proceedings, nor precludes Defendants Jeannette Villarreal, Leannette Villarreal, and Zeannette Salazar from contesting their liability or guilt in any other matter or proceeding.

Accordingly, **IT IS ORDERED, ADJUDGED, AND DECREED** pursuant to 26 U.S.C. §§ 7402(a), 7407, and 7408 that Defendants Jeannette Villarreal, Leannette Villarreal, and Zeannette Salazar, and all persons and entities in active concert or participation with Defendants Jeannette Villarreal, Leannette Villarreal, and Zeannette Salazar, are **PERMANENTLY ENJOINED** as of the date of entry of this injunction, from directly or indirectly:

5. Acting as federal tax return preparers, or filing, assisting in, or directing the preparation or filing of federal tax returns, amended returns, or other related federal tax documents or forms for any person other than themselves;
6. Preparing, or assisting in preparing, federal tax returns that they know or reasonably should know would result in an understatement of tax liability or the overstatement of federal tax refund(s) as penalized by 26 U.S.C. § 6694;
7. Representing anyone before the IRS for compensation or any promise of compensation;
8. Directly or indirectly owning, managing, controlling, working for, profiting from, investing in, receiving fees or remuneration from, consulting with, licensing, franchising, or volunteering for any federal tax return preparation business;
9. Advising, training, instructing, teaching, or providing cheat sheets, directions, instructions, or manuals pertaining to the preparation of federal tax returns, or otherwise providing

such assistance to others to violate internal revenue laws or unlawfully evade the assessment or collection of their federal tax liabilities, including the misuse of IRS Forms 1040, 1040X, Schedule C, or other IRS forms by inputting false or fabricated information;

10. Seeking permission or authorization (or helping or soliciting others to seek permission or authorization) to file federal tax returns with an IRS Preparer Tax Identification Number (“PTIN”) and/or IRS Electronic Filing Identification Number (“EFIN”), or any other IRS service or program by which one prepares or files federal tax returns;

11. Using, maintaining, renewing, obtaining, transferring, selling, applying for, or assigning any PTIN(s) or EFIN(s); and

12. Engaging in any other activity subject to penalty under 26 U.S.C. §§ 6694, 6695, 6700, or 6701.

IT IS FURTHER ORDERED that:

13. Defendants Jeannette Villarreal, Leannette Villarreal, and Jeannette Salazar shall, at their own expense:


- a. Send by email or certified mail, return receipt requested, a copy of the final injunction entered against them in this action, as well as a copy of this Complaint, to each person for whom they prepared federal income tax returns or any other federal tax forms after January 1, 2020;
- b. Turn over to the United States within 30 days a list with the names, addresses, telephone numbers, email addresses, and social security numbers of all persons for whom they, or their employees, prepared returns or amended returns after January 1, 2020;

- c. Prominently post a copy of the final injunction entered in this case at Defendants' place of business where tax returns are prepared by them or their employees, including at J&G Armadillo's Tax Services, LLC (also known as Reals Tax Services);
- d. Keep all social media accounts and websites used to advertise their tax preparation services open for at least one year after entry of the judgment and post on all such social media accounts and websites: "Jeannette Villarreal, Leannette Villarreal, and Zcannette Salazar have been permanently enjoined from preparing federal income taxes by the United States District Court for the Southern District of Texas.";
- e. File sworn statements with the Court evidencing Defendants' compliance with the foregoing directives within forty-five (45) days of entry of the final injunction in this case; and
- f. Keep records of Defendants' compliance with the foregoing directives, which may be produced to the Court, if requested, or the United States pursuant to paragraph 14 below.

14. The United States is entitled to conduct post-judgment discovery to monitor Defendants Jeannette Villarreal, Leannette Villarreal, and Zcannette Salazar's compliance with the terms of this injunction; and

15. The Court shall retain jurisdiction over Defendants Jeannette Villarreal, Leannette Villarreal, and Zcannette Salazar, and this action, to enforce this injunction and any additional orders necessary and appropriate to the public interest.

SIGNED: 1/11/23 2023.



NELVA GONZALES RAMOS
UNITED STATES DISTRICT JUDGE