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IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PRISCILLA E. SCHROCK,  
individually and d/b/a  
SOUTH BEACH MISSIONS.

Defendant.

Case No. 3:16-cv-2019

COMPLAINT

The United States of America, for its complaint against Priscilla E. Schrock, individually and doing business as South Beach Missions, states as follows:

COMPLAINT - 1  
Case No. 3:16-cv-2019

### **Nature of the Case**

1. The United States brings this complaint pursuant to 26 U.S.C.<sup>1</sup> §§ 7402 and 7408 to enjoin Schrock, individually and doing business as South Beach Missions, and any other person or persons in active concert or participation with them, from, among other things:
  - a. organizing, promoting, or selling, directly or indirectly, any plan or arrangement, including the “Religious Non-Profit Corporation” (RNPC) scheme described herein, and similar schemes, that includes the use or creation of sham non-profit corporations, or corporations sole;
  - b. engaging in conduct subject to penalty under 26 U.S.C. § 6700, i.e., by making or furnishing, in connection with the organization or sale of a plan or arrangement, including the RNPC scheme, any statement about the securing of a tax benefit by reason of holding an interest in an entity or plan or arrangement that the defendants know or have reason to know to be false or fraudulent as to any material matter under the federal tax laws; and
  - c. providing - for compensation or gifts - advice regarding taxes to any entity or individual.

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<sup>1</sup> All statutory references are to the Internal Revenue Code (“I.R.C.”), 26 U.S.C., unless otherwise noted.

2. An injunction is warranted because Schrock, individually and doing business as South Beach Missions, is promoting an abusive scheme. If not enjoined, Schrock's continued actions will result in the Internal Revenue Service (IRS) having to devote scarce resources to attempt to locate and investigate her customers, who by participating in the RNPC scheme, have either not filed required federal tax returns or filed erroneous federal income tax returns that understate their correct federal income tax liability. Absent a permanent injunction, Schrock's actions may result in the assessment of additional taxes, penalties and other civil and criminal sanctions being imposed against her customers.

### **Jurisdiction and Venue**

3. Jurisdiction is conferred on this Court by 28 U.S.C. §§ 1340 and 1345, and 26 U.S.C. § 7402(a).

4. Venue is proper in this Court pursuant to 28 U.S.C. § 1391.

### **Authorization**

5. This action has been requested by a delegate of the Secretary of the Treasury and commenced at the direction of a delegate of the Attorney General of the United States, pursuant to 26 U.S.C. § 7402 and 7408.

### **Defendants**

6. Defendant, Priscilla E. Schrock ("Schrock") is a resident of Oregon and resides at or conducts business at 15113 S. Maple Lane Road, Oregon City, Oregon 97045.

7. Schrock operates under the name South Beach Missions. South Beach Missions is an active domestic, religious non-profit corporation organized under Oregon law. South Beach Missions' principal place of business is 15113 S. Maple Lane Road, Oregon City, OR 97045. South Beach Missions' mailing address is P.O. Box 66564, Oregon City, OR 97045.

8. Schrock is South Beach Missions' registered agent and was its president until July 2016.

### **Defendants' Activities**

9. Schrock promotes a tax avoidance scheme, or, as she describes it, a "service that facilitates the creation of Religious Non-Profit Corporations (RNPC)." Schrock uses South Beach Missions to promote the sale and use of RNPC's. Schrock tells her customers that RNPC's have certain tax benefits. Schrock organizes and markets the scheme as a means for customers to evade reporting and paying federal taxes, and conceal assets to evade IRS collection efforts.

10. In exchange for what Schrock characterizes as a "one-time gift" of \$695, and subsequent yearly "gifts" of \$245, Schrock files forms with the Oregon Secretary of State to create and maintain a customer's RNPC as a "domestic nonprofit corporation" under Oregon law.

11. The forms Schrock files with the Oregon Secretary of State include Articles of Incorporation (to establish the RNPC) and annual reports.

12. On the forms Schrock files with the Oregon Secretary of State, Schrock lists South Beach Missions as each RNPC's registered agent, with an address of 15113 S. Maple Lane Road, Oregon City, OR 97045. Schrock also uses this address as her business address.

13. As of May 4, 2016, South Beach Missions is the registered agent for at least 471 RNPC's created by Schrock.

14. As part of the services she provides, Schrock obtains an Employee Identification Number (EIN) from the IRS for her customers.

15. Schrock obtains EIN's for her customers because an EIN is necessary to open a bank account.

16. Schrock advises customers to open a bank account in the name of the RNPC. Once the bank account is opened, the RNPC's board members (determined by the customer) are sole managers of the bank account and determine how "corporate funds" in the account are managed.

17. Schrock advises customers that the RNPC is a nontaxable entity.

18. Schrock advises her customers to assign the income they earn to their RNPC. Schrock advises customers that the RNPC can enter into a contract to perform work. She further advises that although the customer, acting as a "volunteer" for the RNPC, actually performs the work, the amount paid under the contract is paid to the RNPC. According to Schrock, because the amount paid under the contract is attributable to the RNPC, the customer owes no federal income tax on the amount paid under the contract. Schrock is wrong.

19. Schrock advises customers that they should receive all monies and other gifts in the name of the RNPC and not in the customer's name. Schrock tells her customers to determine how the RNPC's assets and funds will be managed, to include moving funds "in and out of the US without complications."

20. Schrock advises customers that the RNPC can pay the customer's personal bills "for anything."

21. Schrock created an RNPC as recently as January 22, 2016.

#### **Schrock's Statements**

22. After a customer buys into the scheme by making their "one-time gift" of \$695, Schrock provides the customer with a document entitled "The Religious Non~Profit Non~Stock Corporation."

23. The RNPC document contains several false or fraudulent statements about securing tax benefits that Schrock knows, or has reason to know, to be false or fraudulent as to a material matter under the federal tax laws.

24. Schrock makes numerous false representations to her customers regarding the tax consequences of creating an RNPC. These misrepresentations include:

- a. RNPC's are exempt from the jurisdiction of the IRS;
- b. the RNPC is a legal vehicle that can be used to hold property and protect the property from federal tax liens, levies, seizures under the Internal Revenue Code and confiscation from events arising as a result of customer's personal actions and liabilities;
- c. the RNPC is registered as a religious entity whose purpose is education, medical services, or whatever the customer decides is worthy of its efforts and therefore the RNPC is entitled to all the considerations of other churches and religious societies, including buying, holding, and selling property with "complete Federal income tax immunity." Notwithstanding that the RNPC is ostensibly created for a religious purpose, the customer has complete discretion as to the RNPC's activities and spending, to include transferring the RNPC's property to "anyone, in any amount, and for any purpose;"
- d. there are no laws that regulate RNPC's;
- e. the RNPC is not required to maintain records, is exempt from record keeping requirements and that any records kept are only for the private use of the RNPC;
- f. by transferring assets to the RNPC, all monies and gifts received by the RNPC separates the customer from ownership, even though the customer determines how the RNPC's funds and assets are used;
- g. any assets transferred to the RNPC are protected from IRS liens;

- h. all earnings earned by a RNPC are “exempt from the federal income tax”;
  - i. because the “IRS does not control corporations” an RNPC may give a “gift” to any individual without regard to the Internal Revenue Code’s limits on the exclusion of gifts from the gift tax and that the RNPC is not required to file gift tax returns and pay gift tax;
  - j. RNPC’s are not required to file federal tax returns with the IRS or report income assigned to the RNPC on their own federal tax return based on the false premise that the RNPC is exempt from the jurisdiction of the IRS.
25. Schrock causes her customers to file income tax returns that fail to fully report all of their income or to not file tax returns at all.
26. Schrock advises customers to transfer property to the RNPC in order to avoid federal tax liens.
27. Schrock represents to her customers that the intent of the RNPC is “to help in humanitarian and religious causes and not to avoid taxes.” This statement is false; the intent of the scheme is to avoid taxes by assigning income to the RNPC even though the income is earned by, and taxable to, the individual who performed the services. The scheme is also designed to shield assets from IRS collection.
28. Schrock relies primarily on “word of mouth” and the recommendations of other customers to obtain new customers.
29. The RNPC’s that Schrock creates do not confer any legitimate tax benefits on her customers.

30. In order to receive special tax status and be exempt from income taxation, an entity must independently qualify as a religious or charitable organization pursuant to 26 U.S.C. § 501(c)(3). Contrary to Schrock's statements to her customers, organizations established under § 501(c)(3) must meet certain filing and reporting requirements with the IRS.

31. On April 10, 2008, the United States District Court for the District of Oregon entered a permanent injunction against several defendants, including John D. Fitzgerald and American Family Enterprise Inc., enjoining them from perpetrating substantially the same scheme involving RNPC's, involving sham non-profit corporations used to evade federal taxes. See United States v. Fitzgerald, et al., Case No. 3:07-cv-1416-MO (USDC D. Oregon), Doc. No. 31.

32. Schrock and Fitzgerald were or are friends.

33. After this Court enjoined Fitzgerald from promoting the scheme, Schrock became the registered agent for some of Fitzgerald's customers' RNPC's.

34. The IRS has identified 9 RNPC entities that used Fitzgerald or American Family Enterprise, Inc.'s address when they applied for their EIN. Since some time after 2008 to the present, Shrock or South Beach Missions serve as registered agent for each of these 9 entities.

35. The IRS has previously issued consumer alerts regarding sham non-profits, also referred to as a corporation sole, and advised the public to be aware of tax evasion schemes that misuse corporation sole laws. (See <https://www.irs.gov/pub/irs-news/ir-04-042.pdf>, archived at <https://perma.cc/89MH-J2ME>).

36. The IRS' alert described above states: "Scheme promoters typically exploit legitimate laws to establish sham one-person, nonprofit religious corporations. Participants in the scam apply for incorporation under the pretext of being a "bishop" or "overseer" of the phony religious organization or society. The idea promoted is that the arrangement entitles the individual to exemption from federal income taxes as an organization described in Section 501(c)(3) laws... Used as intended, Corporation Sole statutes enable religious leaders — typically bishops or parsons — to be incorporated for the purpose of insuring the continuation of ownership of property dedicated to the benefit of a legitimate religious organization. Generally, creditors of a Corporation Sole may not look to the assets of the individual holding the office nor may the creditors of the individual look to the assets held by the Corporation Sole."

37. The IRS has specifically advised that "A taxpayer cannot use a corporation sole created to avoid or evade income taxes as a means to exclude the taxpayer's personal income from tax." (See <https://www.irs.gov/Charities-&-Non-Profits/Corporation-Sole>, archived at <https://perma.cc/R4VK-SD6D>).

38. Schrock has created, or facilitated the existence of, at least 471 sham entities by either forming the entity or filing annual reports with the Secretary of State.

**The RNPC scheme causes Schrock's customers to underreport their federal tax liabilities**

39. Customers A, B, C, D, E F, and G all purchased RNPC's from Schrock.

Customers A & B

40. The RNPC sold to Customers A & B serves as an example of the harm that Schrock, individually and doing business as South Beach Missions, inflicts on members of the public (the customers) and the United States.

41. Customers A & B are a married couple.

42. In 2001, Schrock filed with the Oregon Secretary of State, articles of incorporation for a domestic non-profit religious corporation (“A & B corporation”).

43. Customers A & B serve as A & B corporation’s President and Secretary, respectively.

44. South Beach Missions is A & B corporation’s registered agent, with an address at 15113 S. Maple Lane Road, Oregon City, OR 97045.

45. During tax years 2010 and 2011, Customers A & B received income from work they performed in construction, cleaning and home-based sale businesses.

46. During tax years 2010 and 2011, Customers A and B deposited this income into several bank accounts they had opened in the name of A & B corporation at Mountain West Bank.

47. Schrock advised Customers A and B that A & B corporation was not required to file a tax return.

48. During an IRS examination, Customers A and B objected to the IRS issuing a summons for information regarding A & B corporation’s bank accounts because they claimed that A & B corporation was a “Nonprofit religious corporation” and outside of the IRS’ “subject matter jurisdiction.”

49. The IRS obtained the bank statements for A & B corporation from Mountain West Bank. The bank statements show that Customers A and B deposited income into A & B corporation’s bank account and did not report this income on their 2010 and 2011 federal income tax returns. The unreported gross income deposited into the corporation’s bank accounts was:

<b>Year</b>	<b>Unreported Gross Receipts</b>
2010	\$59,673
2011	\$70,209

50. The IRS issued a statutory notice of deficiency to Customers A & B for their 2010 and 2011 tax years proposing to assess additional tax based on the unreported income reflected above, as well as other issues concerning unreported income and unsubstantiated deductions.

51. Customers A & B filed a petition with the United States Tax Court requesting a redetermination of their 2010 and 2011 federal income tax liabilities.

52. Customers A & B agreed that at least part of the unreported gross income described above was received from Customer A's construction business and Customer B's cleaning and home-based sale businesses.

53. In the Tax Court proceeding, Customers A & B agreed to tax deficiencies of \$10,858 for 2010 and \$1,267.00 for 2011; and an accuracy-related penalty under 26 U.S.C. § 6662(a) for tax year 2010 in the amount of \$1,619.

#### Customers C & D

54. Customers C & D are a married couple.

55. In 2010, Schrock filed with the Oregon Secretary of State, articles of incorporation for a domestic non-profit religious corporation ("C & D Corporation") and named South Beach Missions as C & D Corporation's registered agent and herself as President.

56. On April 14, 2011, in an amended annual report filed with the Oregon Secretary of State, Customers C and D were named C & D Corporation's President and Secretary, respectively. According to the most recent annual report, Customers C & D remain in these positions.

57. South Beach Missions remains C & D Corporation's registered agent, with an address at 15113 S Maple Ln Rd, Oregon City, OR 97045.

58. Customers C & D established a checking account at US Bank in the name of C & D Corporation.

59. Customers C & D failed to file individual income tax returns for, among other years, tax years 2010 and 2011.

60. C & D Corporation did not file an income tax return for tax years 2010 and 2011.

61. During tax years 2010 and 2011, Customers C & D received income. During tax years 2010 & 2011, Customers C & D deposited some of this income into C & D Corporation's US Bank checking account, which was not reported to the IRS. The amounts are reflected in the table below:

<b>Year</b>	<b>Unreported Income</b>
2010	\$3,740.03
2011	\$442.28

62. The unreported income in C & D Corporation's US Bank account contributed, in part, to the IRS' determination that the Customers C & D were liable for income tax deficiencies of \$6,675 in 2010 and \$5,685 in 2011.

#### Customers E & F

63. Customers E & F are a married couple.

64. Customers E & F are President and Secretary, respectively of E & F corporation, an Oregon domestic non-profit religious corporation which was incorporated in 2007.

65. South Beach Missions is E & F corporation's registered agent, with an address of 15113 S. Maple Lane Road, Oregon City, OR 97045.

66. Customers E & F established a checking account at Marine Credit Union in the name of E & F corporation.

67. Customers E & F operate a trucking business.

68. Customers E & F titled a 1999 Peterbilt truck in the name of E & F corporation.

69. Customers E & F deposited income from their trucking business into E & F corporation's bank account at Marine Credit Union.

70. Customers E & F did not timely file federal income tax returns for tax years 2008, 2009, 2010, 2011 and 2012.

71. The IRS examined Customers E & F's income for tax years 2008, 2009, 2010, 2011 and 2012 and concluded that Customers E & F failed to report gross income from their trucking business in the following amounts:

<b>Year</b>	<b>Unreported Gross Income from Trucking Business</b>
2008	\$209,961
2009	\$58,692
2010	\$4,090
2011	\$21,498
2012	\$9,139

72. During the IRS' examination, and after consultation with a tax professional, Customers E & F provided the IRS with tax returns that reported the gross income from their trucking business, but at that point they claimed to have disposed of documents to substantiate their expenses. Because Customers E & F had disposed of documents to substantiate their expenses, they were unable to deduct the full amount of expenses they claim they were otherwise entitled to deduct.

73. The unreported income received by Customers E & F, and improperly assigned to E & F corporation, contributed in part, to the IRS' determination that Customers E & F are liable for income tax deficiencies in the following amounts:

<b>Year</b>	<b>Deficiencies</b>
2008	\$44,989
2009	\$18,008

2010	\$4,724
2011	\$10,587
2012	\$11,946

Customer G

74. Customer G is the President of G corporation, an Oregon domestic non-profit religious corporation which was incorporated in 2007.

75. South Beach Missions is G corporation's registered agent, with an address of 15113 S. Maple Lane Road, Oregon City, OR 97045.

76. In 2008, Customer G established a checking account in the name of G corporation at Liberty Bank. Customer G had signature authority over the Liberty Bank account and exercised unfettered dominion and control over the account.

77. In tax years 2009, 2010, 2011, and 2012, Customer G had income. Customer G did not file timely federal income tax returns for any of these years.

78. The IRS examined Customer G's income for tax years 2009, 2010, 2011, and 2012.

79. During the examination, the IRS determined that Customer G had deposited income to G corporation's Liberty Bank account and included that income in computing Customer G's unreported gross receipts, which totaled the following amounts:

<b>Year</b>	<b>Unreported Gross Receipts</b>
2009	\$75,795
2010	\$68,711
2011	\$118,983
2012	\$145,486

80. G corporation did not file tax returns for tax years 2009, 2010, 2011, and 2012.

81. Customer G failed to report the income that was deposited into the Liberty Bank account, in part, because Schrock incorrectly told him that G corporation was not subject to the internal revenue laws.

82. The unreported income in G corporation's Liberty Bank account contributed, in part, to the IRS' determination that the Customers G is liable for tax deficiencies in the following amounts:

<b>Year</b>	<b>Deficiency</b>
2009	\$21,765
2010	\$19,437
2011	\$40,276
2012	\$45,637

#### **The RNPC scheme causes irreparable harm**

83. The harm Schrock's abusive RNPC scheme causes is substantial. The United States Treasury, Schrock's customers, and the taxpaying public are all affected by the scheme.

84. Schrock's conduct harms the Government in several ways, including (a) lost revenue due to the failure of customers to file proper income tax returns and pay taxes on income earned, (b) the expense incurred by the IRS in conducting investigations, and examining Schrock's customers, and (c) the delay and expenses incurred in attempting to locate additional customers hiding their income in an RNPC.

85. Because Schrock tells her customers that that the RNPC's corporate records are only for the RNPC's private use and need not be reported to the IRS, the IRS faces further difficulties in examining the customer's tax returns: the taxpayers are generally non-cooperative. Given the IRS' limited resources, identifying all of Schrock's customers and recovering all revenues lost from the fraudulent scheme is likely impossible, resulting in a permanent loss to the United States Treasury.

86. Schrock's customers have been harmed by the promotion because the customers have paid significant sums to establish worthless legal entities and they have received erroneous tax advice that has led them to fail to file required tax returns and to understate their federal income tax liabilities.

87. The customers are harmed because they remain liable for any unpaid federal taxes they owe. They will also be liable for interest that has accrued on their unpaid federal tax obligations.

88. The customers may be liable for substantial federal tax penalties, including, but not limited to the accuracy-related penalty under 26 U.S.C. § 6662, the frivolous return penalty under 26 U.S.C. § 6702, and the failure to file a required return penalty under 26 U.S.C. § 6651(a)(1).

89. The public is harmed by the RNPC scheme because Schrock's activities and statements undermine public confidence in the fairness of the federal tax system and incite noncompliance with the tax laws.

**Count I: Injunction under 26 U.S.C. § 7408**

90. The United States incorporates by reference the allegations contained in paragraphs 1 through 89.

91. 26 U.S.C. § 7408(a) authorizes a district court to enjoin any person from engaging in specified conduct, including conduct that is subject to penalty under § 6700.

92. 26 U.S.C. § 6700 imposes a civil penalty on any person who (1) either organizes or assists in the organization of a plan or arrangement or participates in the sale of any interest in a plan or arrangement; and (2) makes or furnishes, or causes another to make or furnish a statement with respect to the allowability of any deduction or credit, the excludability of any income, or the securing of any tax benefit by reason of holding an interest in the entity or participating in the plan or arrangement which the person knows or has reason to know is false or fraudulent as to any material matter.

93. The RNPC scheme that Schrock organizes and sells constitutes a plan or arrangement under § 6700. In organizing and selling the RNPC scheme, Schrock made false and fraudulent statements regarding the tax benefits associated with participation in the scheme. Schrock knew, or had reason to know, that the statements were false or fraudulent as to material matters within the meaning of 26 U.S.C. § 6700. Schrock, individually and doing business as South Beach Missions, has engaged in conduct that is subject to penalty under § 6700.

94. Unless enjoined by this Court, Schrock, individually and doing business as South Beach Missions, is likely to continue to engage in this conduct and continue to organize and sell the abusive RNPC scheme. Injunctive relief is appropriate under 26 U.S.C. § 7408.

**Count II: Injunction under 26 U.S.C. § 7402**

95. The United States incorporates by reference the allegations contained in paragraphs 1 through 94.

96. Section 7402(a) authorizes a district court to issue injunctions and to render judgments that may be “necessary or appropriate for the enforcement of the internal revenue laws,” even when the United States may have other remedies available for enforcing those laws.

97. Schrock's actions described above, substantially interferes with the administration and enforcement of the internal revenue laws.

98. Unless Schrock is enjoined, the IRS will have to devote substantial time and resources to identify and locate Schrock's customers, examine the customers' tax returns and recompute the customers' true federal income tax liabilities. The burden of identifying and examining individual customers associated with 471 entities may be an insurmountable obstacle given the IRS' limited resources.

99. If Schrock is not enjoined, she will likely continue to engage in conduct that obstructs and interferes with the enforcement of the internal revenue laws. The United States is entitled to injunctive relief pursuant to 26 U.S.C. § 7402 to prevent such conduct.

WHEREFORE, the United States prays for the following relief:

- A. That the Court find that Schrock has engaged in conduct subject to penalty under 26 U.S.C. § 6700, and that injunctive relief is appropriate under 26 U.S.C. § 7408 to prevent Schrock, individually and doing business as South Beach Missions, and any business or other entity through which Schrock operates, and anyone acting in concert with her, from engaging in such further conduct;
- B. That the Court find that Schrock, individually and doing business as South Beach Missions, has engaged in conduct that interferes with the enforcement of the internal revenue laws, and that injunctive relief against Schrock and any business or other entity through which Schrock operates, and anyone acting in concert with her, is appropriate to prevent the recurrence of that conduct pursuant to the Court's powers under 26 U.S.C. § 7402(a).

C. That this Court find that Schrock, individually and doing business as South Beach Missions, engaged in conduct subject to penalty under § 6700 and, under §§ 7402(a) and 7408, enter an order prohibiting Schrock, individually and doing business as South Beach Missions, her representatives, agents, servants, employees, and anyone in active concert or participation with her, from directly or indirectly:

1. organizing, promoting, or selling, directly or indirectly any plan or arrangement, including the RNPC scheme, and any similar schemes, that includes the use or creation of sham non-profit corporations or “corporations sole.”
2. engaging in conduct subject to penalty under 26 U.S.C. § 6700, i.e., by making or furnishing in connection with the organization or sale of a plan or arrangement, including the RNPC scheme, a statement about securing any tax benefit that the Schrock knows or has reason to know to be false or fraudulent as to any material matter under the federal tax laws; and
3. providing - for compensation or gifts - advice regarding taxes to any entity or individual.

D. That the Court, pursuant to 26 U.S.C. § 7402, order Schrock, individually and doing business as South Beach Missions, and anyone acting in active concert or participation with her, to resign as the registered agent of any corporation or other entity created through the RNPC scheme, and to file a certification with the Court within 20 days of the date the permanent injunction is entered certifying that they have done so.

- E. That the Court, pursuant to 26 U.S.C. § 7402, enter an injunction prohibiting Schrock, individually and doing business as South Beach Missions, and anyone acting in active concert or participation with her, from filing papers on behalf of another with any state agency that regulates corporations, including corporate annual reports or new corporate registrations with the State of Oregon, or any other state.
- F. That the Court, pursuant to 26 U.S.C. § 7402(a), order Schrock, individually and doing business as South Beach Missions, and anyone acting in active concert or participation with her, at their own expense, to contact by U.S. mail all customers and persons who paid, donated or gifted money to Schrock or South Beach Missions to establish or maintain an RNPC or any other similar entity, arrangement, or program and inform those individuals of the Court's findings concerning the falsity of prior representations made by Schrock, individually and doing business as South Beach Missions, and attach a copy of the permanent injunction against Schrock and to file with the Court, within 30 days of the date the permanent injunction is entered, a certification under penalty of perjury, that they have done so.

- G. That the Court, pursuant to 26 U.S.C. § 7402, order Schrock, individually and doing business as South Beach Missions, and anyone acting in active concert or participation with her, to remove from their business premises and websites and all other websites over which they have control, if any, all RNPC scheme promotional materials, false commercial speech regarding the internal revenue laws, and speech likely to incite others to violate the internal revenue laws; to display prominently at the top of the first page of those websites a complete copy of the permanent injunction; and to maintain a copy of the injunction on those websites for at least one year, and until such websites are no longer accessible to the public; and
- H. That the Court, pursuant to 26 U.S.C. § 7402, order Schrock to identify in a statement signed under penalty of perjury, all individuals who participated in the RNPC scheme, either as a customer who purchased an RNPC or purportedly made a donation or gift, or as a person who acted in concert with Schrock in promoting the scheme, along with their addresses, telephone numbers and email addresses.
- I. That the Court order that the United States may engage in post-judgment discovery to ensure compliance with the injunction;
- J. That the Court retain jurisdiction over this action for purposes of implementing and enforcing the final judgment; and
- K. That the Court grant such other and further relief as the Court may deem proper and just.

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Dated: October 20, 2016

/s/ Christopher R. Moran  
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