

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MARK CRUMPACKER,)	
)	Case No. 1:16-cv-01053
Plaintiff,)	
)	
v.)	
)	
CAROLINE CIRAOLO-KLEPPER;)	
MICHAEL MARTINEAU;)	
MARK J. LANGER;)	
COMM'R., INTERNAL REVENUE;)	
UNITED STATES ATTORNEY GENERAL;)	
and)	
2 UNKNOWN-NAMED IRS/DOJ)	
ATTORNEYS,)	
)	
Defendants.)	
)	
<hr/> UNITED STATES OF AMERICA)	
)	
Counterclaim Plaintiff,)	
)	
v.)	
)	
MARK CRUMPACKER,)	
MICHAEL B. ELLIS, and)	
ROBERT A. MCNEIL)	
)	
Counterclaim Defendants.)	
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UNITED STATES' MOTION FOR PERMANENT INJUNCTION

The United States of America moves the Court pursuant to Rule 65 of the Federal Rules of Civil Procedure for entry of a permanent injunction against counterclaim defendants Mark Crumpacker, Michael B. Ellis, and Robert A. McNeil barring them from filing future district court actions challenging actions by the Internal Revenue Service without prior leave of court.

As more fully set forth in the attached memorandum of law, the grounds for this motion are as follows:

- (1) An injunction is necessary and appropriate under the Court's inherent authority to prevent the filing of further actions by the counterclaim defendants without prior leave of court, because (i) the actions filed by the counterclaim defendants to date are numerous, duplicative, and frivolous; and (ii) the counterclaim defendants are using their actions to harass IRS employees, attorneys for the Department of Justice, and Judicial Officers;
- (2) The United States is entitled to an injunction as a matter of law under 26 U.S.C. § 7402(a), because the counterclaim defendants' filing of numerous frivolous lawsuits against the IRS, the DOJ, and its employees, interfere with the enforcement of the internal revenue laws.

This motion for permanent injunction is based on the pleadings, the records and files in this case, and the memorandum of law submitted herewith.

WHEREFORE, the counterclaim plaintiff the United States of America respectfully requests that the court enter the injunction submitted herewith (i) barring the counterclaim defendants from filing future legal challenges against the IRS or Department of Justice without first obtaining leave of court; and (ii) directing counterclaim defendants Ellis and McNeil to conspicuously post a copy of the injunction on McNeil's website, www.ram-v-irs.com.

Dated: February 28, 2017

CHANNING D. PHILLIPS
United States Attorney

DAVID A. HUBBERT
Acting Assistant Attorney General

/s/ Ryan O. McMonagle
RYAN O. MCMONAGLE
Trial Attorney, Tax Division
U.S. Department of Justice
P.O. Box 227
Washington, D.C. 20044
Telephone: (202) 307-1355
Fax: (202) 514-6866
Email: Ryan.McMonagle@usdoj.gov

CERTIFICATE OF SERVICE

I certify that on February 28, 2017 I filed the foregoing Motion for Permanent Injunction, the attached Memorandum of Law, and the attached Proposed Order of Injunction with the Clerk of Court using the CM/ECF system, and have caused a copy thereof to be served by U.S. mail, postage prepaid, to the following:

Mark Crumpacker
14933 Daffodil Avenue
Canyon Country, California 91387
Plaintiff/Counterclaim Defendant/Cross-Counterclaim Plaintiff, pro se

Michael B. Ellis
5052 NE County Road 220
Rice, Texas 75155
Counterclaim Defendant/Cross-Counterclaim Plaintiff, pro se

Robert A. McNeil
729 Grapevine Highway #148
Hurst, Texas 76054
Counterclaim Defendant/Cross-Counterclaim Plaintiff, pro se

/s/ Ryan O. McMonagle
RYAN O. MCMONAGLE