

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF THE DISTRICT OF COLUMBIA

|                           |   |                            |
|---------------------------|---|----------------------------|
| UNITED STATES OF AMERICA, | ) |                            |
|                           | ) | Case No. 1:22-cv-02811-CRC |
| Plaintiff,                | ) |                            |
|                           | ) |                            |
| v.                        | ) |                            |
|                           | ) |                            |
| ROBERT J. SHAUGHNESSY and | ) |                            |
| SUSAN J. SHAUGHNESSY,     | ) |                            |
|                           | ) |                            |
| Defendants.               | ) |                            |
| _____                     | ) |                            |

**JOINT MOTION FOR ENTRY OF CONSENT JUDGMENT**

Plaintiff United States of America and Defendants Robert Shaughnessy and Susan Shaughnessy respectfully request that the Court enter a consent judgment in the above-captioned case, in favor of the United States and against Robert and Susan Shaughnessy, for their unpaid federal income tax liabilities for tax years 2001 through 2006, 2008 through 2011, and 2016, in the total amount of **\$7,258,580.52** as of January 16, 2023, plus statutory interest and other additions to tax accruing thereafter according to law until paid in full.

Dated: April 17, 2023

Respectfully submitted,

DAVID HUBBERT  
Deputy Assistant Attorney General

/s/ Emily K. Miller  
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| UNITED STATES OF AMERICA, | ) |                            |
|                           | ) | Case No. 1:22-cv-02811-CRC |
| Plaintiff,                | ) |                            |
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| v.                        | ) |                            |
|                           | ) |                            |
| ROBERT J. SHAUGHNESSY and | ) |                            |
| SUSAN J. SHAUGHNESSY      | ) |                            |
|                           | ) |                            |
| Defendants.               | ) |                            |
| _____                     | ) |                            |

**CONSENT JUDGMENT**

Upon the consent and agreement of the parties, it is hereby **ORDERED, ADJUDGED,**  
and **DECREED** as follows:

1. The Parties' Joint Motion for Entry of Consent Judgment (ECF No. 9) is  
**GRANTED**; and
2. **JUDGMENT** is entered as to Count I in favor of the United States of America  
and against Defendants Robert J. Shaughnessy and Susan J. Shaughnessy for the unpaid federal  
income tax liabilities for tax years 2001 through 2006, 2008 through 2011, and 2016, in the total  
amount of **\$7,258,580.52** as of **January 16, 2023**, plus statutory interest and other additions to  
tax accruing thereafter according to law until paid in full.

Dated this the \_\_\_\_\_ day of \_\_\_\_\_, 2023.

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The Honorable Christopher R. Cooper  
United States District Judge  
District of Columbia