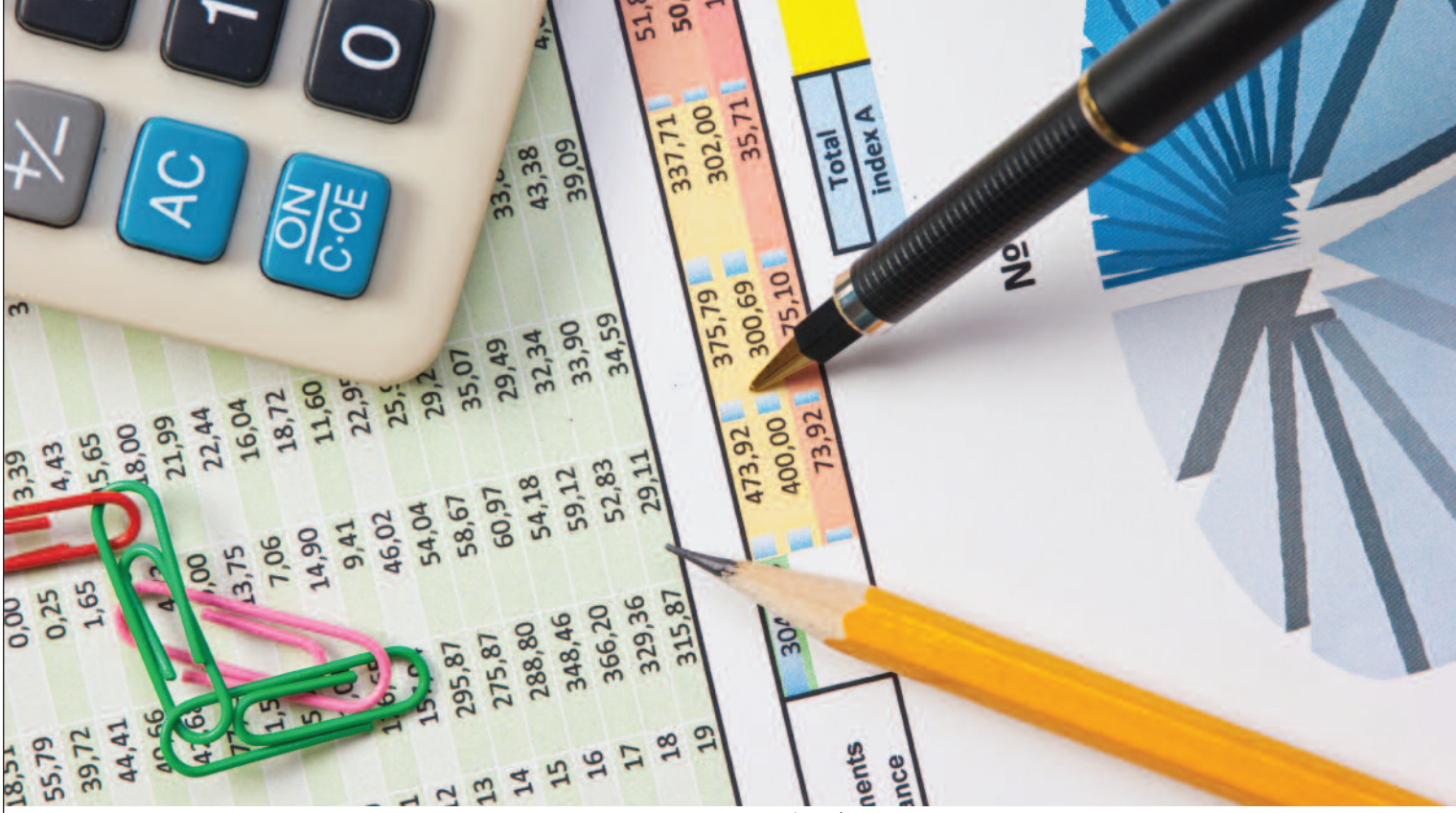

Ethical and Strategic Issues Unique to Tax Cases

BY SARAH Q. WIRSKYE

There are certain ethical issues that white collar criminal defense practitioners will undoubtedly encounter in their everyday practice. In addition to those issues, criminal tax cases present their own unique challenges. If defense counsel is dabbling in this area, it is not only important to understand the tax and procedural nuances specific to criminal tax cases, but also the ethical issues as well.

The primary ethical issues unique to tax cases arise in the following situations: (1) filing of the current year return; (2) the Fifth Amendment act of production privilege; (3) dealing with the prior year return; (4) "practicing" before the IRS; and (5) conflicts of interest, particularly regarding husbands and wives who have filed joint tax returns. A defense lawyer must be careful when advising clients so that she is not exposed to liability from the clients, or worse yet, the government.

I. Current Year Return

In most areas of criminal law, advising a client who is under investigation to stop his criminal activity is an easy issue. Tax cases are different, however, because the client must file tax returns during the pendency of a criminal investigation, or even an eggshell audit,[1] that may later be used as admissions against the client.

The client who is under investigation should file extensions to postpone filing the current year return and forms as long as possible. Every once in a while an investigation may come to a quick conclusion and defense counsel will not have to deal with this issue. However, because criminal tax investigations usually last for 18 to 30 months, this is something that will likely have to be addressed.

Therefore, a taxpayer under criminal investigation frequently faces difficult issues when the time comes to file a current tax return. Issues under criminal tax investigation often carry over into subsequent years. For example, the current return may report income or deductions in an amount that confirms a Special Agent's suspicions that the taxpayer has underreported income or falsely reported deductions in prior years. The truthful reporting of current amounts of income or deductions may also provide leads to an Agent using an indirect method of proof. Another sensitive area may involve foreign accounts or assets that were not disclosed on prior returns and forms as required.

A. Admission by Taxpayer

The current return can be used as an admission against the taxpayer.[2] The return is a sworn statement by the taxpayer, filed under penalties of perjury.

Tax returns from prior years are often important in "net worth" cases to establish the taxpayer's net worth. The Internal Revenue Service utilizes different methods

of proof to establish a taxpayer's net income. The net worth method of proof utilizes evidence of income applications such as asset accumulation, liability reduction, expenditures, and other financial data to indirectly establish correct taxable income. This method is often used in criminal tax cases.

For example, in *United States v. Mackey,*[3] the defendant was convicted of tax evasion under 26 U.S.C. § 7201. The government used the net worth method to prove its case. Specifically, the government used the defendant's and his wife's income tax returns from 1929 through 1955 to determine their net worth at the starting point at issue in the criminal case, December 31, 1955, as $361,461.52. The government took the position that their net worth at the end of 1960 was $1,519,744.05, and included assets held in the names of companies and other nominees for the benefit of defendant. During this five-year period, defendant and his wife reported $143,339.24 of taxable income. Therefore, defendant's own tax returns were used as an admission to calculate his net worth.

B. Duty to File Returns

The pendency of a criminal investigation is not grounds for failing to file a current return. In *United States v. Sullivan*,[4] the defendant was convicted of willfully refusing to file a tax return. The appellate court reversed, holding that gains from illicit traffic in liquor were subject to income tax, but the Fifth Amendment protected the defendant from filing a return. In reversing the appellate court, the Supreme Court stated as follows:

> As the defendant's income was taxed, the statute of course required a return. [Citation omitted]. In the decision that this was contrary to the Constitution we are of opinion that the protection of the Fifth Amendment was pressed too far. If the form of return provided called for answers that the defendant was privileged from making he could have raised the objection in the return, but could not on that account refuse to make any return at all. … It would be an extreme if not an extravagant application of the Fifth Amendment to say that it authorized a man to refuse to state the amount of his income because it had been made in crime. But if the defendant desired to test that or any other point he should have tested it in the return so that it could be passed upon.[5]

Therefore, a return must be filed regardless of whether filing the return may be incriminating.

Moreover, the current return must be timely, complete, and accurate.[6] It cannot contain false statements or omissions. In *United States v. Knox*,[7] the taxpayer did file a return, but falsified statements to avoid self-incrimination. The Court upheld defendant's conviction and stated that "one who furnishes false information to the government in feigned compliance with a statutory requirement cannot defend against prosecution for his fraud by challenging the validity of the requirement itself."[8]

As the advisor, defense counsel *must* advise the client to file required, accurate returns. Under Circular 230 — a publication of certain U.S. Treasury regulations that includes the rules governing practice before the Internal Revenue Service — defense counsel must also advise the client regarding penalties and exposure on not doing so. Any other advice could possibly expose counsel to liability as a co-conspirator or aider and abettor.

C. Fifth Amendment Returns

One option available to a taxpayer under criminal investigation is the filing of a current return that invokes the Fifth Amendment privilege against self-incrimination. When a taxpayer is faced with the Hobson's choice of alerting the IRS to his prior fraud by filing accurate returns or alerting the IRS to his prior fraud by asserting the Fifth Amendment to specific issues, neither option is particularly attractive.

An individual asserting the privilege must do so at the time of filing the return. For example, in *Garner v. United States*,[9] Roy Garner appealed his conviction for various nontax crimes arising from his gaming activities. The government introduced petitioner's income tax returns to prove the offense against him. The issue was whether the introduction of this evidence, over petitioner's Fifth Amendment objection, violated the privilege against compulsory self-incrimination when Garner made the incriminating disclosures on his returns instead of then claiming the privilege. Citing *Sullivan,* the Court stated that "the privilege against compulsory self-incrimination is not a defense to prosecution for failing to file a return at all, but the Court indicated that the privilege could be claimed against specific disclosures sought on a return." The Court further stated that if Garner had invoked the privilege against compulsory self-incrimination on his tax returns in lieu of supplying the information used against him, he could have been criminally prosecuted under 26 U.S.C. § 7203 for failure to make a return. The Court began its analysis of the issue by emphasizing that a witness must claim the Fifth Amendment privilege, and the failure to do so is a waiver of the privilege. The Court held that the incriminating disclosures on the tax return were not "compelled" and that Garner was foreclosed from invoking the privilege when such information was later introduced as evidence against him in a criminal prosecution.

A taxpayer cannot make a blanket assertion of the Fifth Amendment. Such a return is not deemed a return. In *United States v. Jordan*,[10] the defendant was indicted for failure to file tax returns for four years under 26 U.S.C. § 7203. The court rejected Fred Jordan's argument that "returns" he filed were sufficient to satisfy the filing requirements of § 6011. "[A] taxpayer's return which does not contain any information relating to the taxpayer's income from which the tax can be computed is not a return within the meaning of the Internal Revenue Code or the regulations. …"[11] IRS Forms 1040 containing only the defendant's name, address, Social Security Number, and a blanket declaration regarding his Fifth Amendment privilege are not deemed tax returns as required by law. Therefore, the privilege must be asserted explicitly, on the return, with respect to specific entries or information that might tend to incriminate the taxpayer.

Finally, the privilege can validly be asserted as to an item on a return only if there is a *bona fide* reason an accurate response might subject the taxpayer to criminal prosecution.[12] The defendant in *United States v. Verkuilen*[13] was convicted of failing to file tax returns. He filed Form 1040s with the words "Object: Self-incrimination" or "None" typed on most of the lines on which income information was requested. Consistent with *Jordan*, the court approved the district court's jury instructions that a taxpayer's return that does not contain any information relating to the taxpayer's income from which the tax can be computed is not a return. The court went on to state that "a taxpayer must make a colorable showing that he is involved in some activity for which he could be criminally

prosecuted in order to validly claim the Fifth Amendment privilege on his income tax return." The court approved the district court's jury instruction that stated the following:

> An individual who refuses to disclose the amount of his income derived from a legitimate source on the grounds that such disclosure would violate his Fifth Amendment privilege against self-incrimination has improperly invoked and asserted the Fifth Amendment privilege, unless he can show some possibility that such a disclosure may lead to a criminal prosecution. The mere unsupported assertion of a Fifth Amendment privilege, without some additional explanation, does not establish that the invocation of the Fifth Amendment was proper. An improper invocation of the Fifth Amendment is not an adequate justification for failure to file a tax return.

Therefore, the court affirmed defendant's conviction.

D. 'Preparation' of the Current Year Return

There is no accountant-client privilege in criminal matters. As the criminal attorney, defense counsel does need to have some role in the return preparation process for the client who is under investigation for a tax crime. Defense counsel needs to review the returns and ensure the returns are accurate. Defense counsel also needs to be prepared to address the current year return if it becomes part of the investigation.

Criminal defense attorneys generally do not complete their clients' tax returns, so this may not appear to be a significant issue. But it is. Obviously, actually preparing the return makes the attorney a preparer. However, what if the attorney drafts a lengthy disclosure attached to the return or advises the actual return preparer regarding specific issues in detail? Do these actions make defense counsel a return preparer? Overall, it is prudent for defense counsel not to become too involved in the details of the return preparation process so that defense counsel is not deemed a tax return preparer.

The Fifth Amendment privilege must be asserted explicitly on the tax return with respect to specific entries or information.

There is no clear guidance on this issue because these issues are case-specific. It is important to note, however, that information transmitted for the purpose of preparing a tax return is not privileged. In *United States v. Lawless*,[14] the taxpayer unsuccessfully challenged summonses to testify regarding the tax return and produce certain documents. Respondent J. Martin Lawless argued that the information transmitted to him (as the attorney preparing the tax return), which was not disclosed on the return, was protected. The court disagreed, saying that "information transmitted for the purpose of preparation of a tax return, though transmitted to an attorney, is not privileged information."[15]

A different accountant should prepare the taxpayer's current year return. The prior accountant will be a fact witness if the case escalates. Filing accurate returns may also involve disclosing information to the prior tax preparer that could potentially be used as an admission against the client.

Because communications with a tax return preparer are not subject to privilege, counsel must be careful not to reveal information or client disclosures that defense counsel would not want disclosed. This applies to verbal discussions, correspondence, and work product shared with the preparer.

II. Books and Records and The Fifth Amendment

A. Act of Production Privilege

It is well-established law that a witness may claim the privilege against self-incrimination as to any matter within his personal knowledge if his testimony would provide a link in the chain of evidence needed to prosecute him for a criminal offense.[16]

It is important to keep in mind, however, that the client may have a Fifth Amendment act of production privilege regarding documents in a criminal tax investigation. In such a situation, the act of production privilege may apply if producing a document would "communicate [incriminating] information about the [document's] existence, custody [or] authenticity" separate from its contents.

B. Required Records Doctrine

With the recent IRS focus on foreign account cases, there has been a resurgence of the assertion of the act of production privilege. The government frequently issues summonses or grand jury subpoenas requesting all records of foreign financial accounts in which a taxpayer had an interest. Possession and production of these records could be incriminating. Alternatively, not maintaining these records could be incriminating because the taxpayer can be prosecuted for the failure to keep and maintain these records for five years.

In response to assertions of the Fifth Amendment act of production privilege in these cases, the government has relied on the required records doctrine. The required records doctrine originated in *Shapiro v. United States*,[17] a case in which the Court held that the Fifth Amendment

did not apply to business records that a fruit wholesaler was required to keep under a wartime price control program. The government has relied on *Shapiro* in the recent foreign account cases, arguing that the foreign account records are also required to be kept.

Recently, taxpayers have unsuccessfully asserted the act of production privilege in foreign account cases. For example, in *United States v. Under Seal*,[18] the court held that because the records sought in the grand jury subpoenas met all the requirements of the required records doctrine, the Fifth Amendment privilege was inapplicable, and unnamed taxpayers Jane and John Doe could not invoke it to shield themselves from the requests set forth in the subpoenas. Specifically, the first element of the required records doctrine, the "essentially regulatory" requirement, was satisfied because the recordkeeping requirements of the Bank Secrecy Act[19] serve purposes unrelated to criminal law enforcement and its provisions do not apply exclusively to those engaged in criminal activity. Second, the "customarily kept" requirement was satisfied because the records sought were the same type that the Does had to report annually to the IRS, as required by the regulations of offshore banking. Moreover, the records were the same type that a reasonable account holder would keep in order to be able to access account funds. Third, the records had "public aspects" because the government's purpose in imposing this regulatory scheme is to share the information it collects with a number of other agencies, which is primarily done to serve important public purposes.

C. Corporation Versus Individual

Under the "collective entity doctrine," the Fifth Amendment privilege does not apply to artificial entities such as corporations or to their custodian of records who claims that producing documents will incriminate the custodian personally. In *Braswell v. United States*,[20] relying on *Fisher v. United States*,[21] the Court held that such entities act only through agents. Allowing these agents to assert the act of production privilege would extend the privilege to the entities, which have no Fifth Amendment privilege. Whether the subpoena is addressed to the corporation or to an individual as custodian, the collective entity doctrine precludes the use of the right against self-incrimination because records are being produced in the custodian's representative capacity.

In *United States v. Doe*,[22] the Supreme Court addressed Fifth Amendment protection for the contents of a sole proprietorship's business records. It ruled that because a subpoena does not compel a witness to prepare the records demanded, the witness may not assert his privilege against self-incrimination on the grounds that the contents of the records might incriminate him. However, extending *Fisher* to a sole proprietor's business records, the Court ruled that a witness could claim his Fifth Amendment privilege in response to a summons or subpoena for his personal business and financial records when the act of production would be testimonial and incriminating.

III. Prior Year Returns

A. Kovel Accountant

In most criminal tax cases it is helpful to retain an accountant to review the taxpayer's financial records, assist in the building of a defense, and possibly testify at trial as an expert. Such an accountant, called a *Kovel* accountant,[23] should be engaged by counsel because the attorney-client privilege will therefore extend to his work.

To save money, the client may wish to have counsel hire the client's return preparer as the investigative accountant. This would be a mistake because the preparer is a potential fact witness, and if the case goes to trial, the fact-finder undoubtedly will not consider him an objective expert witness. Moreover, using the return preparer as the expert witness creates difficulty for the witness in distinguishing what he learned in a privileged context versus what he learned while preparing the returns under investigation.

B. Amending Tax Returns

During a criminal investigation, the taxpayer should not, without professional guidance and the clearance of his criminal attorney, file amended tax returns. The filing of such returns may constitute either an admission or, if they are not complete and truthful, a separate criminal offense.

This is an easy decision to make if the client is the target of a criminal tax investigation. The issue may be more complicated, however, when defense counsel represents an individual more remotely connected to the investigation. There have been cases in which the smaller players have been charged and convicted of tax crimes, in part, because of amended returns filed during an investigation. Before amending returns, counsel should consult with the counsel for the target and carefully analyze if

amending returns is advisable. If the investigation may expand and there is a chance the client may become a target, the client may be better off making a deposit under Section 6603 (which is a remittance to the Internal Revenue Service that is not treated as a payment) rather than amending returns.

IV. Practice Before the IRS

A criminal tax case often begins with an administrative investigation by the IRS Criminal Investigation Division, and may involve parallel proceedings in which the IRS is taking a leading or substantive role. The criminal tax client may want criminal defense counsel to represent her in the IRS proceeding because of defense counsel's familiarity with the issues in the case. Before agreeing to serve in this capacity, defense counsel must be familiar with Circular 230, the rules established for practicing before the IRS.

Particularly relevant to defense counsel are the Circular 230 provisions regarding how attorneys should handle client omissions of pertinent information from documents relating to IRS matters. When an attorney knows that a client is not in compliance with the Internal Revenue Code, the attorney must "advise the client promptly" of the "noncompliance, error, or omission."

In such a situation, defense counsel must make sure that there are no issues under the applicable state bar rule regarding candor to the tribunal. ABA Model Rule 3.03 speaks to that delicate balance between zealous advocacy and candor to the tribunal by prohibiting an attorney from acting dishonestly.

(a) A lawyer shall not knowingly:

(1) make a false statement of fact or law to a tribunal or fail to correct a false statement of material fact or law previously made to the tribunal by the lawyer;

(2) fail to disclose to the tribunal legal authority in the controlling jurisdiction known to the lawyer to be directly adverse to the position of the client and not disclosed by opposing counsel; or

(3) offer evidence that the lawyer knows to be false. If a lawyer, the lawyer's client, or a witness called by the lawyer, has offered material evidence and the lawyer comes to know of its falsity, the lawyer shall take reasonable remedial measures, including, if necessary, disclosure to the tribunal. A lawyer may refuse to offer evidence, other than the testimony of a defendant in a criminal matter, that the lawyer reasonably believes is false.

(b) A lawyer who represents a client in an adjudicative proceeding and who knows that a person intends to engage, is engaging or has engaged in criminal or fraudulent conduct related to the proceeding shall take reasonable remedial measures, including, if necessary, disclosure to the tribunal.

(c) The duties stated in paragraphs (a) and (b) continue to the conclusion of the proceeding, and apply even if compliance requires disclosure of information otherwise protected by Rule 1.6.

(d) In an ex parte proceeding, a lawyer shall inform the tribunal of all material facts known to the lawyer that will enable the tribunal to make an informed decision, whether or not the facts are adverse.

A common question that arises with respect to the requirement to disclose certain information to a tribunal is whether the Internal Revenue Service is classified as a "tribunal." One ABA Formal Opinion[24] indicates that the IRS is neither a tribunal nor a quasi-tribunal. The opinion, however, goes on to say that attorneys cannot make false assertions, and must advise a client to correct misstatements made to the IRS.

Additionally, a duty to withdraw will arise if "the lawyer believes that the Service relies on him as corroborating statements of his clients which he knows to be false … unless it is obvious that the very act of dissociation" would break client confidences.[25] A later ABA Formal Opinion expands on an attorney's duty of candor toward the IRS by noting that counsel "is under a duty not to mislead the Internal Revenue Service deliberately, either by misstatements or by silence or by permitting the client to mislead."[26]

An attorney also has a duty to exercise diligence when preparing tax documents and determining the accuracy of representations made to clients and the IRS. Furthermore, submitting false or misleading information to the IRS and giving false opinions on Federal tax questions, either intentionally or recklessly, resulting from misstatements of

facts or law, could potentially subject an attorney to sanctions from the Service.

V. Conflicts of Interest

Counsel should always be mindful of potential conflicts of interest that may arise with joint representation in a civil tax examination, which may later become a criminal case. It is not uncommon for counsel to represent a husband and wife who filed a joint return in a civil tax examination. And there is nothing generally wrong with doing so.

ABA Model Rule 1.7 provides as follows regarding conflicts of interests and current clients:

(a) Except as provided in paragraph (b), a lawyer shall not represent a client if the representation involves a concurrent conflict of interest. A concurrent conflict of interest exists if:

(1) the representation of one client will be directly adverse to another client; or

(2) there is a significant risk that the representation of one or more clients will be materially limited by the lawyer's responsibilities to another client, a former client or a third person or by a personal interest of the lawyer.

(b) Notwithstanding the existence of a concurrent conflict of interest under paragraph (a), a lawyer may represent a client if:

(1) the lawyer reasonably believes that the lawyer will be able to provide competent and diligent representation to each affected client;

(2) the representation is not prohibited by law;

(3) the representation does not involve the assertion of a claim by one client against another client represented by the lawyer in the same litigation or other proceeding before a tribunal; and

(4) each affected client gives informed consent, confirmed in writing.

Another variation to the ABA Model Rules concerning general conflicts of interest, found in many state bar rules, addresses former clients. Generally, this type of rule states a lawyer who has represented multiple parties in a matter shall not thereafter represent any of such parties in a dispute among the parties arising out of the matter, unless prior consent is obtained from all such parties to the dispute.

In re Taylor[27] presents an example of a former client conflict arising during the divorce proceedings of a couple who had previously been jointly represented by an attorney (Wesley Filer). The husband (Terry) hired Filer to prepare the "Stockholder Agreement" for his newly incorporated business. The Stockholder Agreement valued the net worth of the business at $200,000 and was signed by both Terry and his wife (Barbara). Filer also prepared wills and medical and financial powers of attorney for the couple.

Three years later, Terry hired an attorney from the same firm as Filer to represent him in the divorce proceedings, without first obtaining Barbara's consent. The court found that the stock of Terry's business was worth over five times the value of the couple's next largest community asset. Thus, the court held the divorce proceedings to be a dispute arising out of the same matter (the preparation of the Stockholder Agreement) for which the couple had previously been jointly represented by Filer.

The court then referred to Texas State Bar Rule 1.06(f), which precludes attorneys of the same firm from representing a client when any attorney at the firm is precluded from representing that client under Rule 1.06. Accordingly, all of the attorneys from Filer's firm were barred from representing Terry in the divorce proceedings.

Therefore, a civil tax case related to a criminal tax case can be a complex issue from a potential conflict of interest analysis. As discussed above, there are ethical issues regarding whether counsel can continue to represent one of the taxpayers.

Further complications may arise if counsel retained one *Kovel* accountant (which is usually the case with a husband and wife filing joint tax returns) on behalf of both clients. For example, if a criminal referral is made after a *Kovel* accountant has done work in a civil tax audit, there may be issues concerning whether that accountant's work product may be used for the benefit for one or more of the defendants. This may be particularly problematic if one defendant wants to rely on the work product and the other does not.

No one-size-fits-all answer will resolve a "conflicts" issue. But it is something that counsel must keep in mind at the beginning of a representation in the event there is a criminal referral. Engagement letters should be carefully drafted to state there is no current conflict, and conflict waivers for the civil representation should be included. They should also contain language stating that the attorney may continue to represent one of the clients if such representation is proper under the State Board and Internal Revenue Service's rules. Finally, when a criminal referral is made following a civil tax audit, it may be advisable for counsel to withdraw so that both clients can retain their own, new criminal counsel.

VI. Conclusion

In additional to the tax and procedural nuances specific to criminal tax cases, counsel should be aware of ethical issues when representing a client in a criminal tax investigation. Failure to do so could be disastrous for not only the client, but counsel as well.

(Continued on page 34)

(Continued from page 31)

Notes

1. An eggshell audit is one in which the client and the representative are aware of potential indicators of civil fraud or criminal tax violations that have not been raised by the Internal Revenue Service.

2. *United States v. Dinnell*, 428 F. Supp. 205, 208 (D. Ariz. 1977), *aff'd without op.*, 568 F.2d 779 (9th Cir. 1978).

3. *United States v. Mackey*, 345 F.2d 499 (7th Cir. 1965), *cert. denied*, 382 U.S. 824 (1965).

4. *United States v. Sullivan*, 274 U.S. 259 (1927).

5. *Id.* at 263-64.

6. 26 U.S.C. § 7206(1); *United States v. Knox*, 396 U.S. 77 (1969).

7. *Id.* at 78.

8. *Id.* at 79.

9. *Garner v. United States*, 424 U.S. 648 (1976).

10. *United States v. Jordan*, 508 F.2d 750 (7th Cir.) *cert. denied*, 423 U.S. 842 (1975).

11. *United States v. Porth*, 426 F.2d 519, 523 (10th Cir. 1970).

12. *United States v. Verkuilen*, 690 F.2d 648 (1982).

13. *Id.* at 651.

14. *United States v. Lawless*, 709 F.2d 485 (1983).

15. *Id.* at 488.

16. *Bellis v. United States*, 417 U.S. 85, 87, 94 S. Ct. 2179, 40 L. Ed. 678 (1974).

17. *Shapiro v. United States*, 335 U.S. 1 (1948).

18. *United States v. Under Seal*, 737 F.3d 330 (4th Cir. 2013).

19. 31 C.F.R. § 1010.420 promulgated under 31 U.S.C. § 5314.

20. *Braswell v. United States*, 487 U.S. 99 (1988).

21. *Fisher v. United States*, 425 U.S. 391 (1976).

22. *United States v. Doe*, 465 U.S. 605 (1984).

23. The term *Kovel* accountant stems from *United States v. Kovel*, 296 F.2d 918 (2d Cir. 1961). In that case, a grand jury subpoenaed an accountant employed by a law firm representing the target of the grand jury's investigation. The accountant refused to answer questions posed by the grand jury and was held in contempt. The court of appeals reversed the contempt citation, viewing the accountant as a translator hired by a lawyer representing a client who spoke a foreign language. As a result of *Kovel*, information passed among an accountant, defense lawyer, and client is protected from disclosure through an extension of the attorney-client privilege.

24. ABA Formal Op. 314 (1965).

25. *Id.*

26. ABA Formal Op. 85-352 (1985).

27. *In re Taylor*, 67 S.W.3d 530, 533-34 (Tex. App.-Waco 2002, *no pet.*). ■

About the Author

Sarah Q. Wirskye is a partner with the Meadows Collier law firm. Her practice concentrates on white collar crime, and particularly tax and health-care fraud. She has also defended individuals and entities in civil and administrative actions against the government, including forfeiture and qui tam suits. Ms. Wirskye is also a Certified Public Accountant.

Sarah Q. Wirskye
Meadows, Collier, Reed, Cousins, Crouch & Ungerman, L.L.P.
901 Main Street, Suite 3700
Dallas, TX 75202
214-744-3700
Fax 214-747-3732
E-MAIL swirskye@meadowscollier.com