

# Tax-Exempt Organization Complaint (Referral)

## Referred Organization Information

1. Name of referred organization

America Family Law Center

2. Street address

2028 E. Ben White Blvd., Suite 240-1638

3. City

Austin

4. State

TX

5. ZIP code

78741

6. Date of referral

January 8, 2025

7. Organization's Employer Identification Number (EIN)

27-4362688

## Details of Alleged Violation

8. Name(s) of person(s) involved

Stacey Jenny, thousands of other Texans with low-income who are experiencing family law crises

9. Organizational title(s)

N/A

10. Date(s)

Ongoing

11. Dollar amount(s) (if known)

Millions

12. Description of alleged activities (briefly describe the facts of the alleged violation – Who/What/Where/When/How you learned about and obtained the information in this report. Attach another sheet if needed)

This formal complaint is filed against America Family Law Center (AFLC), a Texas nonprofit corporation that uses its status as a registered 501(c) (3) organization to trick vulnerable people with little income into paying for legal assistance that AFLC does not actually provide. It appears that AFLC misrepresents to the IRS what it does with hundreds of thousands of dollars it swindles from these unsuspecting people each year, including an accurate reporting of how it spends and discloses this money.

AFLC claims that it is devoted to helping people with few resources get family law help and assistance in Texas, but in reality, AFLC does not offer a deliverable product or service. Instead, AFLC scams desperately needed funds from the people it purports to serve while defrauding the IRS by providing private benefits to insiders; failing to report income and these private benefits; and misreporting income and material facts.

The Texas Legal Services Center (TLSC) is an actual nonprofit legal services organization that provides legal advice, advocacy, and representation to underserved people across the state of Texas. TLSC offers these legal services to survivors of domestic violence, sexual assault, abuse, exploitation, as well as specialized legal assistance to veterans, the elderly, and people who have disabilities. TLSC has received several dozen complaints about AFLC taking money from its clients, then failing to provide the services it promised. Many of these victims complain that AFLC managed to trick them not only with false promises, but with the belief that it would help them because it was a nonprofit dedicated to addressing their family law needs. Some of these people do not just lose their money to AFLC – they lose their cases and their loved ones, as well.

Please see the attached complaint for a detailed description of AFLC's violations.

## Submitter Information

13. Name

Texas Legal Services Center

14. Occupation or business

Nonprofit organization that provides free legal advice, advocacy, representation, and education to underserved people across the state of Texas.

15. Street address

1920 E. Riverside Dr., Suite A-120 #501

16. City

Austin

17. State

TX

18. ZIP code

78741

19. Telephone number

512-477-6000

20. I am concerned that I might face retaliation or retribution if my identity is disclosed

## Submission and Documentation

The completed form, along with any supporting documentation, may be mailed to IRS TEGE Classification, Mail Code 4910DAL, 1100 Commerce Street Dallas, TX 75242-1027 or emailed to [eclass@irs.gov](mailto:eclass@irs.gov). **Disclaimer Notice:** Your email submission of Form 13909 and attachments are not encrypted for security.

**Details of Alleged Violations**

12. Description of alleged activities (attached sheet)

This formal complaint is filed against America Family Law Center (AFLC) and its programs, associates, affiliates, insiders, employers, and representatives<sup>1</sup> because it defrauds the IRS by providing private benefits to insiders, failing to operate in accord with its stated (or any) exempt purpose, failing to report income and private benefits to insiders, and misreporting financial information on its 990s. AFLC then uses its 501(c)(3) status to commit fraud against unsuspecting individuals by tricking them into paying for legal assistance that AFLC does not provide. Some victims have reported that AFLC does not just cause them to lose their money, but their cases and their loved ones, as well.

**Summary of Violations**

1. *Private benefits to insiders:* The significant income AFLC generates from its clients privately benefits its few board members with hundreds of thousands of dollars.
2. *Failure to operate in accord with stated exempt purposes:* AFLC does not actually provide a deliverable product or service to its clients. Although it reports to the IRS that its purpose is “helping children and parents of low income and at-risk families with matters involving parenting, child access, and family law” and “facilitating their access to justice,”<sup>2</sup> AFLC’s true purpose is to funnel money to its insiders.
3. *Failure to report income:* AFLC has failed to properly report income and expenditures to and from insiders and their businesses and enterprises, and its insiders have failed to properly report income and expenditures to and from AFLC.
4. *Misreporting income and material facts:* AFLC has misreported income and expenditures for many years to the IRS, as well as material facts such as the familial and business relationships and transactions with its Board President.

<sup>1</sup> Attachment A, AFLC Aliases, Programs, Associates, and Assumed Names.

<sup>2</sup> Attachment L, 2022 AFLC IRS Form 990, Part III.

## **Evidence and Attached Documentation**

- A. AFLC Aliases, Programs, Associates, and Assumed Names
- B. Yelp reviews for America Family Law Center
- C. Google reviews for America Family Law Center
- D. Robert Alver Lansink v. The State of Texas
- E. Robert Lansink Is a Vexatious Litigant – 324<sup>th</sup> District Court
- F. Robert Lansink Is a Vexatious Litigant – Eleventh Court of Appeals
- G. Robert Lansink Charged with Fraud
- H. Sworn Deposition Testimony of AFLC Executive Director Teresa Kenton
- I. Fast Legal Document Service – Certificate of Formation Nonprofit Corporation
- J. AFCA, LLC – Certificate of Formation
- K. 2023 AFLC IRS Form 990
- L. 2022 AFLC IRS Form 990
- M. 2021 AFLC IRS Original Form 990
- N. 2021 AFLC IRS Amended Form 990
- O. 2020 AFLC IRS Form 990
- P. 2019 AFLC IRS Form 990
- Q. AFCA, LLC Website Screenshots
- R. DTPA Complaint
- S. UPL Complaints
- T. Complaints to the Texas Attorney General's Consumer Protection Division
- U. Indeed reviews for America Family Law Center

### **How America Family Law Center scams its clients and violates federal tax law**

America Family Law Center (AFLC) is a Texas nonprofit corporation and is currently tax-exempt under section 501(c)(3) of the Internal Revenue Code. AFLC targets vulnerable people throughout Texas who are enduring family law crises and tricks them into paying for services it does not actually provide, eventually scamming hundreds and sometimes even thousands of dollars from people with low income. AFLC may be contacted through its registered agent, Scan Mailboxes Solutions, LLC at 2028 Ben White Blvd., Ste. 240-16387, Austin, TX 78741-1342.

AFLC uses its status as a registered nonprofit and 501(c)(3) organization to trick vulnerable people with low income into paying for legal assistance it does not actually provide. It intentionally markets itself to people who have low income and spends hundreds of thousands of dollars in search engine optimization every year to drive people to its own websites and call center.<sup>3</sup> AFLC puts its nonprofit status front and center in its websites and marketing materials to lure people who have little or no money, claiming that it is devoted to helping the low-

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<sup>3</sup> Attachment H Sworn Deposition Testimony of AFLC Executive Director Teresa Kenton at 110-115, 216; Attachment O, 2020 AFLC IRS Form 990, Part IX, 12; Attachment M, 2021 AFLC IRS Original Form 990, Part IX, 12; Attachment L, 2022 AFLC IRS Form 990, Part IX, 12; Attachment K, 2023 AFLC IRS Form 990, Part IX, 12.

income and underserved get family law help and assistance in Texas, and that it seeks to help close the Justice Gap for low-income Texans. In reality, AFLC scams desperately needed funds from the people it purports to serve and funnels that money to the private individuals sitting on its board of directors.

Individuals call AFLC because they are experiencing a legal crisis and have limited means. AFLC is running a large-scale operation: it can field roughly 2,000 calls a day and may convince 10-20 of those callers to part with their scarce resources. To make this scheme profitable, it pressures its employees to meet numerical quotas with bonuses, commissions, and penalties,<sup>4</sup> and uses several aliases, programs, and DBAs.<sup>5</sup> Once it convinces people with legal crises to contact its call centers, AFLC's employees make bold – but false – promises to provide legal assistance that AFLC does not, and will not, provide.<sup>6</sup>

The moment a person reaches AFLC, its representatives promise unsuspecting callers that AFLC will win their cases if they just provide their bank account, debit card, or credit card information to pay a few hundred dollars. AFLC is well aware, but does not make clear to its new clients, most of whom have little or no money, that it does not and will not provide the services it promises to people who call.<sup>7</sup> In fact, AFLC does not offer a deliverable product or service.<sup>8</sup> AFLC also typically forges contracts that its clients do not read, agree to, or sign using a customized electronic program to make its clients incorrectly believe they have incurred obligations to AFLC and waived important legal rights.

AFLC positions itself as a 501(c)(3) nonprofit organization in order to fool people into believing that its purpose is to help them, not to take their hard-earned money. In reality, this “nonprofit” is a money-making scheme designed to enrich members of its private board of directors – especially the President of the Board, Robert “Bob” Lansink. Meanwhile, the organization’s nonprofit designation not only falsely coaxes people seeking legal help to place their trust in AFLC, but it conveniently allows the organization to avoid taxes on the hundreds of thousands of dollars it swindles from these unsuspecting people every year before it funnels the

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<sup>4</sup> Attachment H, Sworn Deposition Testimony of AFLC Executive Director Teresa Kenton at 57, 158-160.

<sup>5</sup> Attachment A, AFLC Aliases, Programs, Associates, and Assumed Names.

<sup>6</sup> Attachment H, Sworn Deposition Testimony of AFLC Executive Director Teresa Kenton at 161, 198.

<sup>7</sup> Attachment H, Sworn Deposition Testimony of AFLC Executive Director Teresa Kenton at 161, 198.

<sup>8</sup> Attachment H, Sworn Deposition Testimony of AFLC Executive Director Teresa Kenton at 184.

money to Lansink and his cronies. Lansink is a convicted thief and has been declared a vexatious litigant by the courts of the state of Texas.<sup>9</sup>

Bob Lansink founded AFLC, and soon after, installed his old high school flame, Teresa Kenton, as its Chief Executive Officer. Lansink and Kenton are engaged and share finances and properties.<sup>10</sup> Lansink's fiancée runs AFLC on his behalf, and she wears many hats while doing so. Kenton is not only the organization's Executive Director, but its accountant and bookkeeper, as well as the Treasurer on its board of directors.<sup>11</sup> The two sit at the top of the AFLC pyramid, where they are aware of and encourage AFLC's employees to make false and material misrepresentations and conceal important facts from clients and potential clients. Kenton has admitted to misrepresenting important facts to the IRS, too, in her role as AFLC's Treasurer, accountant, and bookkeeper, including misreporting millions of dollars in payments to AFLC's officers, directors, trustees, and key employees for the last few years that AFLC filed 990s.<sup>12</sup> Unsurprisingly, AFLC lacks the standard safeguards that nonprofits should have in place to prevent blatant conflicts of interest and nepotism.<sup>13</sup>

Under Lansink and Kenton's direction, AFLC does not just swindle money from people in legal crises who can least afford to lose it; it redirects hundreds of thousands – if not millions – of untaxed dollars into other Lansink companies and organizations that can more directly benefit Lansink and Kenton. AFCA, LLC and Fast Legal Document Service are two of these.<sup>14</sup> Fast Legal Document Service is another supposed nonprofit that solicits money from unsuspecting people who need family law representation. AFLC refers clients to Fast Legal Document Service, which takes more of their money and then fails to provide promised legal documents or, worse, furnishes documents that cause its clients to lose their cases. Although Fast Legal Document Service is registered as a nonprofit, its only three board members are Lansink, his fiancée, and her son.<sup>15</sup>

Lansink's AFCA, LLC, meanwhile, poses as a technology company. AFLC has paid hundreds of thousands, if not millions, of the dollars it swindled from clients to Lansink's company over the years, directly and indirectly

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<sup>9</sup> Attachments D, E, and F, Cases Showing Robert Lansink Is a Convicted Thief and Vexatious Litigant.

<sup>10</sup> Attachment H, Sworn Deposition Testimony of AFLC Executive Director Teresa Kenton at 29, 101, 232-33.

<sup>11</sup> Attachment H, Sworn Deposition Testimony of AFLC Executive Director Teresa Kenton at 30, 31, 35, 54.

<sup>12</sup> Attachment H, Sworn Deposition Testimony of AFLC Executive Director Teresa Kenton at 93:11-17 and 98:6-20.

<sup>13</sup> Attachment H, Sworn Deposition Testimony of AFLC Executive Director Teresa Kenton at 53.

<sup>14</sup> Attachment I, Fast Legal Document Service Certificate of Formation; Attachment J, AFCA, LLC Certificate of Formation.

<sup>15</sup> Attachment I, Fast Legal Document Service Certificate of Formation.

benefiting Lansink in the process. For example, the \$279,000 in “legal expenses” that AFLC reported to the IRS in its 990 filed in 2021 was actually paid to AFCA, LLC.<sup>16</sup> The same 990 from 2021 also lists over three quarters of a million dollars in “information technology” expenses that AFLC also paid to AFCA, LLC for “the development of different apps.”<sup>17</sup> This means that AFLC paid half of its revenue – over \$1 million – directly to a company owned by the President of its own Board of Directors.

The 990 AFLC filed in 2022 lists similarly exorbitant sums in these categories. It spent almost \$400,000 on “Legal” and “Information Technology” that year, giving nearly 20% of the money it scammed from clients directly to Lansink’s company.<sup>18</sup> Yet Kenton, despite being AFLC’s Executive Director, CEO, Treasurer, and employee in charge of managing AFLC’s budget and preparing its tax returns, does not know if AFCA, LLC actually provided any apps to AFLC. The IRS should scrutinize all funds reported as “Information Technology” and “Legal,” as these payments appear to end up in the hands of Lansink.

In fact, AFLC has taken great pains to hide its relationships with AFCA, LLC, and Fast Legal Document Service. AFLC failed to disclose the business relationships to the IRS between itself, Lansink, and AFCA, LLC and between itself and Fast Legal Document Service, or report the payments it made to AFCA, LLC as compensation to an independent contractor on AFLC’s 990s for all of the years that it paid money to them, including 2020, 2021, 2022, and 2023.<sup>19</sup> Specifically, when asked to report to the IRS whether AFLC was party to a business transaction with a current or former officer, director, trustee, key employee, creator or founder, or substantial contributor, Kenton answered “no.”<sup>20</sup> AFLC also answered “no” when asked if AFLC was party to a business transaction with a family member of a current or former officer, director, trustee, key employee, creator

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<sup>16</sup> Attachment M, 2021 AFLC IRS Original Form 990, Part IX, 11(b); Attachment H, Sworn Deposition Testimony of AFLC Executive Director Teresa Kenton at 98:21-99:4. Kenton did not report this when asked about the “five highest compensated independent contractors that received more than \$100,000 of compensation from the organization” in Part VII, Section B of AFLC’s 990.

<sup>17</sup> Attachment M, 2021 AFLC IRS Original Form 990, Part IX, 14; Attachment H, Sworn Deposition Testimony of AFLC Executive Director Teresa Kenton at (99:11-21).

<sup>18</sup> Attachment L, 2022 AFLC IRS Form 990; Attachment H, Sworn Deposition Testimony of AFLC Executive Director Teresa Kenton at 101:22-102:5

<sup>19</sup> Attachment O, 2020 AFLC IRS Form 990, Part IV, Question 28; Attachment M, 2021 AFLC IRS Original Form 990, Part IV, Question 28; Attachment L, 2022 AFLC IRS Form 990, Part IV, Question 28; Attachment K, 2023 AFLC IRS Form 990, Part IV, Question 28

<sup>20</sup> Attachment O, 2020 AFLC IRS Form 990 Part IV, Question 28(a); Attachment M, 2021 AFLC IRS Original Form 990, Part IV, Question 28(a); Attachment L, 2022 AFLC IRS Form 990, Part IV, Question 28(a); Attachment K, 2023 AFLC IRS Form 990 Part IV, Question 28(a).

or founder, or substantial contributor, despite being in business with Teresa Kenton's son, Aaron Kenton.<sup>21</sup> And when asked whether AFLC was party to a business transaction with a 35% controlled entity of one or more of the former individuals, Kenton again answered, "no."<sup>22</sup> AFLC goes so far as to tell the IRS "No" when answering, "Did any officer, director, trustee, or key employee have a family relationship or a business relationship with any other officer, director, trustee, or key employee?"<sup>23</sup>

In exchange for the exorbitant amounts of money that AFLC paid to it, AFCA, LLC is supposed to have provided technology to AFLC. It appears, however, that AFCA, LLC merely poses as a technology company. Its website is replete with links to services AFCA, LLC allegedly provides, but these links either do not work or lead to web pages that look like website templates.<sup>24</sup> Even if AFCA, LLC did provide something to AFLC, the large sums AFLC paid it easily exceed the fair market value of any alleged products or services received by AFLC. Regardless, it is clear that AFCA, LLC is, in fact, simply an intermediary through which AFLC provides untaxed dollars directly to Lansink.

#### **About Texas Legal Services Center and how we obtained the information in this report**

The Texas Legal Services Center (TLSC) is an actual nonprofit legal services organization that provides legal advice, advocacy, representation, and underserved people across the state of Texas, including providing critical legal services – including representation in family law cases – to survivors of domestic violence, sexual assault, abuse, exploitation, and trafficking and providing specialized legal assistance to veterans. We have received several dozen complaints about AFLC swindling money from its clients, then failing to provide the services it promised. TLSC has taken legal action against AFLC in a number of different ways, including filing complaints with the Texas Attorney General's Consumer Protection Division and the State Bar of Texas' Unauthorized Practice of Law Committee and a lawsuit alleging violations of Texas' consumer protection laws.

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<sup>21</sup> Attachment O, 2020 AFLC IRS Form 990 Part IV, Question 28(b); Attachment M, 2021 AFLC IRS Original Form 990, Part IV, Question 28(b); Attachment L, 2022 AFLC IRS Form 990, Part IV, Question 28(b); Attachment K, 2023 AFLC IRS Form 990 Part IV, Question 28(b).

<sup>22</sup> Attachment O, 2020 AFLC IRS Form 990 Part IV, Question 28(c); Attachment M, 2021 AFLC IRS Original Form 990, Part IV, Question 28(c); Attachment L, 2022 AFLC IRS Form 990, Part IV, Question 28(c); Attachment K, 2023 AFLC IRS Form 990 Part IV, Question 28(c).

<sup>23</sup> Attachment O, 2020 AFLC IRS Form 990 Part IV, Question 2; Attachment M, 2021 AFLC IRS Original Form 990, Part IV, Question 2; Attachment L, 2022 AFLC IRS Form 990, Part IV, Question 2; Attachment K, 2023 AFLC IRS Form 990 Part IV, Question 2.

<sup>24</sup> Attachment Q, AFCA, LLC Website Screenshots.

We have obtained a significant amount of discovery through the lawsuit, including many documents attached to this complaint, as well as the sworn deposition of AFLC's Executive Director, Teresa Kenton. We have attached a great deal of evidence to this complaint, but invite the IRS to follow up with us for additional information.

One individual who was swindled by AFLC has personally joined this complaint against AFLC and respectfully asks that its 501(c)(3) status be revoked. Stacey Jenny is a loving mother and grandmother who lives in Houston. After her daughter gave birth to Ms. Jenny's first grandchild, Ms. Jenny welcomed her daughter and granddaughter into her home. For nearly three years, they lived happily together under one roof. Ms. Jenny loved sharing a home with her daughter and granddaughter – it was full of joy and laughter – but she particularly enjoyed seeing her granddaughter, Allie,<sup>25</sup> every day and being such a constant, important part of her upbringing. This all changed in 2019, when Ms. Jenny's daughter was murdered.

In the chaos following Ms. Jenny's daughter's murder, a paternal relative took Allie and brought her to her home – ignoring Ms. Jenny's requests that Allie continue to live with her. Shortly thereafter, Ms. Jenny noticed things that made her worry about Allie's safety with this woman. She observed that her granddaughter had lice, wore clothes that were often dirty, and complained about always being hungry. She also noted that the woman often seemed intoxicated, even when Allie was around, and that she frequently left firearms within Allie's reach. When Ms. Jenny expressed her concerns to the woman, she responded by refusing to let Ms. Jenny talk to Allie altogether. Determined to protect her granddaughter from a dangerous and abusive situation, Ms. Jenny knew she needed to find a family law attorney to help.

Ms. Jenny was desperate to find someone who could help her get access to her granddaughter, but her limited financial resources meant that she would not be able to afford a private attorney. She found AFLC and called a number listed on its website, believing that she was calling a nonprofit organization that provided free legal services. When it answered her call, AFLC promised that, once Ms. Jenny paid a small fee, she could meet with an attorney who would immediately file paperwork that would guarantee she had Allie back within three days. Ms. Jenny was surprised to learn that AFLC's services were not actually free, but she was desperate to get Allie back, so she agreed.

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<sup>25</sup> Allie's true name is not used here because she is a minor.

Ms. Jenny then met with an AFLC representative who told her he was an attorney and promised AFLC could solve her legal problems. The man told Ms. Jenny that he knew which documents she needed to file to get access to her granddaughter and that he even knew of a document she could file that would guarantee she had custody of her granddaughter within three days. The AFLC representative also assured Ms. Jenny that AFLC and its attorneys would represent her in court.

Ms. Jenny provided all the information AFLC said that it needed to draft her legal documents and represent her in her family case. When AFLC finally provided Ms. Jenny with legal documents for her to file in court,<sup>26</sup> she felt so relieved. Unbeknownst to her, however, the legal documents AFLC gave her contained errors and lacked essential information.

When Ms. Jenny took the legal documents AFLC provided to file with the court, the clerk declined the filings and instructed her to refile the documents with corrected language. After she informed AFLC that the documents it drafted contained errors and missing information, AFLC forced Ms. Jenny to pay more money before it would correct the documents. On at least four separate occasions, AFLC provided faulty legal documents to Ms. Jenny and instructed her to file them. Every time the court clerk rejected Ms. Jenny's filings due to errors in the documents, AFLC required Ms. Jenny to pay additional fees to create "corrected" legal documents. It continued to promise her that the newly created documents would be correct the next time. Ms. Jenny was desperate to get her granddaughter back, and she felt that she had no choice but to pay the unexpected fees to AFLC to solve her legal problems like it had promised.

Eventually exasperated by AFLC's inability to provide legal documents containing correct information, Ms. Jenny asked AFLC why it continued to demand additional payment to fix clerical errors when she had already paid AFLC to represent her. It was then, for the first time, that the AFLC representative informed Ms. Jenny that AFLC does not provide legal representation and would not be representing her at any hearings in her case.

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<sup>26</sup> In the past, AFLC occasionally provided legal documents to its clients who paid it enough money, though the documents were faulty. AFLC claims it no longer writes any legal documents. Instead, it now refers clients to Fast Legal Document Service, another of Lansink and Kenton's fraudulent nonprofit organizations. Fast LDS takes more of their money and then fails to provide promised legal documents or, worse, furnishes improper, erroneous documents that cause its clients to lose their cases.

Even though it represented to Ms. Jenny that she would have her granddaughter in three days, AFLC's lies, delays, and fraudulent documents meant that nearly a year had passed before she was finally able to get a hearing scheduled in her case. Ms. Jenny showed up for her hearing alone, without the representation AFLC had promised her. She believed AFLC when it told her that her documents were finally correct and that she would be able to get access to her granddaughter. The paperwork, however, was still not correct.

During the hearing, the judge told Ms. Jenny that she would have won access to her granddaughter if her paperwork had not contained critical errors. Instead, he dismissed Ms. Jenny's case due to errors in the paperwork that AFLC wrote for her. Despite the thousands of dollars in payments AFLC took from Ms. Jenny, it still failed to produce accurate documents. As a direct result, Ms. Jenny never saw her granddaughter again.

AFLC misrepresented itself to Ms. Jenny as an entity that could provide trustworthy legal representation, advice, and documents. However, AFLC does not provide legal representation, and the legal advice and documents it gave her were faulty. In the end, it did not just steal Ms. Jenny's desperately needed funds, but it robbed her of what might have been her last chance to get access to her granddaughter. Since the judge dismissed Ms. Jenny's case, the abusive relative has moved and taken Ms. Jenny's granddaughter Allie with her. AFLC not only profited from taking money for services it does not actually provide – it also hurt a grandmother in ways that will always haunt her.

### **AFLC's Violations of the Internal Revenue Code**

AFLC uses its status as a 501(c)(3) organization not only to falsely coax people seeking legal help to place their trust in AFLC, but also to avoid paying taxes on the hundreds of thousands of dollars it cons from these unsuspecting people every year before it funnels the money directly to Robert Lansink and his cronies. Specifically, AFLC violated section 501(c)(3) of the Internal Revenue Code through:

1. *Private benefits to insiders:* AFLC engages in activities that serve the private interests of board members like Robert Lansink and structures its finances so that its income and assets benefit these insiders. To be tax exempt, no part of the net earnings of a nonprofit may inure to the benefit of any private shareholder or individual. 26 U.S.C. § 501(c)(3). AFLC takes millions of dollars a year from its clients and potential clients, and this money inures in large part to the benefit of AFLC's private board members and directors. Even a small amount of private

inurement is fatal to exemption.<sup>27</sup> And the untaxed funds that AFLC pays directly to Robert Lansink are certainly not small: AFLC has funneled hundreds of thousands, if not millions, of the dollars it swindles from clients directly to Lansink's company, AFCA, LLC.<sup>28</sup> The large sums AFLC pays to AFCA likely exceed the fair market value of any alleged products or services received by AFLC. Inurement can result from an insider receiving very little benefit; and must result when Lansink is unjustly enriching himself with such a large portion of AFLC's earnings – especially when it comes at the expense of the vulnerable individuals AFLC purports to serve.

AFLC also reported nearly a million dollars in compensation to its executives for 2020 and more than a million dollars for 2021.<sup>29</sup> This compensation, which represents half of its annual revenue, is far more money than any nonprofit should pay to executives. And AFLC does not really have executives who are employees apart from Kenton – it only has insiders.

*2. Failure to operate in accord with stated exempt purposes:* AFLC does not pursue the exempt activities it promised in its application and reports to the IRS, and it never intended to pursue these stated purposes at all. To be tax exempt under section 501(c)(3) of the Internal Revenue Code, a nonprofit organization must operate exclusively for its stated exempt purposes. 26 U.S.C. § 501(c)(3). AFLC reported to the IRS that its purposes are “helping children and parents of low income and at-risk families with matters involving parenting, child access, and family law” and “facilitating their access to justice.”<sup>30</sup> However, it does not actually do any of these things. In fact, AFLC does not provide a deliverable product or service to its clients at all.<sup>31</sup> AFLC is neither organized nor operated for any of the exempt purposes listed in section 501(c)(3) because its true purpose is to funnel money to its insiders. Worse, not only does AFLC fail to either “help children and parents of low income and at-risk families with matters involving parenting, child access, and family law” or “facilitate their access to justice,” it exploits these individuals’ crises in order to scam desperately needed funds from the families with little income who can least afford to part with them – actively harming the individuals it purports to serve in the process.

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<sup>27</sup> See *Spokane Motorcycle Club v. U.S.*, 222 F. Supp. 151 (E.D. Wash. 1963), where net profits were found to inure to private individuals where refreshments, goods and services amounting to \$825 (representing some 8% of gross revenues) were furnished to members.

<sup>28</sup> Attachment H, Sworn Deposition Testimony of AFLC Executive Director Teresa Kenton at 98:21-99:21

<sup>29</sup> Attachment M, 2021 AFLC IRS Original Form 990, Part IX, Question 5; and Attachment L, 2022 AFLC IRS Form 990, Part IX, Question 5.

<sup>30</sup> Attachment L, 2022 AFLC IRS Form 990, Part III.

<sup>31</sup> Attachment H, Sworn Deposition Testimony of AFLC Executive Director Teresa Kenton at 184:2-5.

*3. Failure to report income:* AFLC has failed to properly report income and expenditures to and from insiders and their businesses and enterprises, and its insiders may have failed to properly report income and expenditures to and from AFLC, as it was not reported on AFLC's 990. Over the years, AFLC has paid hundreds of thousands, if not millions, of the dollars it swindled from clients to Lansink's company, AFCA, LLC, directly and indirectly benefiting Lansink in the process. In 2020, for example, AFLC paid half of its revenue – over \$1 million – directly to AFCA, LLC.<sup>32</sup> And in 2021, AFLC gave nearly 20% of the money it scammed from clients directly to Lansink's company.<sup>33</sup> AFLC has taken great pains to hide these transactions and the fact that a relationship exists between itself and AFCA, LLC. For all of the years that it paid money to AFCA, LLC, AFLC failed to disclose the business relationship between itself, Lansink, and AFCA, LLC or report the payments as compensation to an independent contractor on AFLC's 990s.<sup>34</sup>

*4. Misreporting income and material facts:* In addition to the above, AFLC has misreported income and expenditures for many years to the IRS. In her sworn deposition testimony, Kenton has admitted to misreporting hundreds of thousands of dollars in payments to AFLC's officers, directors, trustees, and key employees for the last few years that AFLC filed 990s, despite being AFLC's Treasurer, accountant, and bookkeeper.<sup>35</sup> This was not an error AFLC committed in one year only, but across multiple years of 990s that AFLC filed with the IRS.<sup>36</sup> In repeatedly misreporting hundreds of thousands of dollars in payments to its officers, directors, trustees, and key employees, AFLC appears to have misled the IRS about its financial standing and potentially about payments to others that could have deprived the IRS of revenue in the process. AFLC has not merely misreported the numbers, either. It has also misreported material facts that would seem to hide the context of the numbers, such as the familial and business relationships of its board members, officers, and their family members. Similarly,

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<sup>32</sup> Attachment M, 2021 AFLC IRS Original Form 990, Part IX, 11(b) and 14; Attachment H, Sworn Deposition Testimony of AFLC Executive Director Teresa Kenton at 98:21-99:21.

<sup>33</sup> Attachment L, 2022 AFLC IRS Form 990; Attachment H, Sworn Deposition Testimony of AFLC Executive Director Teresa Kenton at 101:22-102:5.

<sup>34</sup> Attachment M, 2021 AFLC IRS Original Form 990, Part IV, Question 28 and Part VII, Section B; Attachment L, 2022 AFLC IRS Form 990, Part IV, Question 28 and Part VII, Section B.

<sup>35</sup> Attachment H, Sworn Deposition Testimony of AFLC Executive Director Teresa Kenton at 93:11-17 and 98:6-20.

<sup>36</sup> AFLC filed an amended 990 for 2021 on August 8, 2024, in what appears to be an attempt to address the deposition testimony elicited from Ms. Kenton. See Attachment N, 2021 AFLC IRS Amended Form 990. However, it did not file amended 990s for 2020 and 2022 – years that AFLC also admitted to misreporting payments to AFLC's officers, directors, trustees, and key employees.

AFLC appears to have falsely denied to the IRS that AFLC was party to a business transaction with a current officer, family member thereof, or entity partially controlled by a current officer or family member thereof.

**Request for Action**

The IRS should investigate and examine America Family Law Center and its associates, affiliates, insiders, employers, and representatives – including Fast LDS, Robert Lansink, Teresa Kenton, and AFCA, LLC - and require the payment of penalty excise taxes as well as terminate the 501(c)(3) tax-exempt status of AFLC and its programs, associates, affiliates, insiders, employers, and representatives.

Dated: January 8, 2024