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JS-6

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UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA  
 WESTERN DIVISION

**IN THE MATTER OF THE TAX  
 LIABILITIES OF:**

Case No.

**SACV13-01097 DDP(VBKx)**

ORDER

JOHN DOES, Norwegian taxpayers  
 holding East West Bank card  
 XXXXXXXXXXXXX2035, or holding  
 Global Cash Card card  
 XXXXXXXXXXXXX0542, or holding  
 Global Cash Card card  
 XXXXXXXXXXXXX7242.

THIS MATTER is before the Court upon the United States of America's Ex Parte Petition for Leave to Serve "John Doe" Summonses. Based upon a review of the Petition, supporting memorandum and exhibits thereto, the Court has determined that the "John Doe" summonses to East West Bank and Global Cash Card relate to the investigation of a particular person or ascertainable group or class of persons, that there is a reasonable basis for believing that such person or group or class of persons may fail or may have failed to comply with any internal revenue law, and that the information sought to be obtained from the examination of the records or testimony (and the identities of the persons with respect to whose

1 liability the summons is issued) are not readily available from other sources. It is  
2 therefore-

3  
4 ORDERED AND ADJUDGED that the Internal Revenue Service, through  
5 Revenue Agent Cheryl Kiger or any other authorized officer or agent, may serve  
6 Internal Revenue Service "John Doe" summonses upon East West Bank and  
7 Global Cash Card in substantially the form as attached as Exhibit A and Exhibit B  
8 to the Declaration of Revenue Agent Cheryl Kiger, respectively. A copy of this  
9 Order shall be served together with the summonses.

10  
11  
12 IT IS SO ORDERED

13  
14  
15 DATED: July 26, 2013

A handwritten signature in cursive script, appearing to read "Daniel D. Layton", is written in a light gray or blue ink.

16  
17 UNITED STATES DISTRICT JUDGE

18  
19 Respectfully submitted,  
20 ANDRE BIROTTE, JR.  
21 United States Attorney  
22 SANDRA R. BROWN  
23 Assistant United States Attorney  
Chief, Tax Division

24 DANIEL LAYTON  
25 Assistant United States Attorney  
26 Attorneys for the United States of America  
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