

COPY FOR JUDGE

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF FLORIDA

CASE NO.

08-21864-MC-LENARD/GARBER

IN THE MATTER OF THE TAX
LIABILITIES OF:

JOHN DOES, United States taxpayers, who at any time during the years ended December 31, 2002 through December 31, 2007, had signature or other authority (including authority to withdraw funds; to make investment decisions; to receive account statements, trade confirmations, or other account information; or to receive advice or solicitations) with respect to any financial accounts maintained at, monitored by, or managed through any office in Switzerland of UBS AG or its subsidiaries or affiliates and for whom UBS AG or its subsidiaries or affiliates (1) did not have in its possession Forms W-9 executed by such United States taxpayers, and (2) had not filed timely and accurate Forms 1099 naming such United States taxpayers and reporting to United States taxing authorities all reportable payments made to such United States taxpayers.

ORDER

THIS MATTER is before the Court upon the United States of America's "*Ex Parte* Petition for Leave to Serve John Doe Summons." Based upon a review of the Petition and exhibits thereto, the Court has determined that the "John Doe" summons to UBS AG and its affiliates and subsidiaries relates to the investigation of an ascertainable group or class of persons, that there is a reasonable basis for believing that such group or class of persons may fail or may have failed to comply with any provision of 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 liability the summons is issued) are not readily

available from other sources. It is therefore—

ORDERED AND ADJUDGED that the Internal Revenue Service, through Revenue Agent Daniel Reeves or any other authorized officer or agent, may serve an Internal Revenue Service “John Doe” summons upon UBS AG and its affiliates and subsidiaries in substantially the form as attached as Exhibit A to the Declaration of Revenue Agent Daniel Reeves. A copy of this Order shall be served together with the summons.

DONE AND ORDERED this 1 day of July, 2008.


UNITED STATES DISTRICT JUDGE

Copies furnished to:

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