

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN THE MATTER OF THE TAX  
LIABILITIES OF:

JOHN DOES, United States taxpayers, who at any time during the years ended December 31, 2004, through December 31, 2012, directly or indirectly had interests in or signature or other authority (including authority to withdraw funds; trade or give instructions or receive account statements, confirmations, or other information, advice or solicitations) with respect to any financial accounts maintained at, monitored by, or managed through Zurcher Kantonalbank and financial accounts maintained at, monitored by, or managed through other Swiss financial institutions that Zurcher Kantonalbank permitted to transact client business through its United States correspondent accounts at Citibank NA and Bank of New York Mellon.

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x

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DOCUMENT  
ELECTRONICALLY FILED  
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Case No. BMC 0378

*KMW* ↓  
~~PROPOSED~~ ORDER GRANTING  
*EX PARTE* PETITION FOR  
LEAVE TO SERVE "JOHN DOE"  
SUMMONSES

ECF Case

THIS MATTER is before the Court upon the United States of America's "Ex Parte Petition for Leave to Serve 'John Doe' Summonses" (the "Petition"). Based upon a review of the Petition and supporting documents, the Court has determined that the "John Doe" summonses to Citibank NA and Bank of New York Mellon relate 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 has failed 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 summonses are issued) is not readily available from other sources. It is therefore:

ORDERED AND ADJUDGED that the Internal Revenue Service, through Revenue Agent Cheryl Kiger or any other authorized officer or agent, may serve Internal Revenue Service "John Doe" summonses upon Citibank NA and Bank of New York Mellon in substantially the

form as attached as Exhibits B and C to the Declaration of Cheryl Kiger. A copy of this Order shall be served together with each summons.

SO ORDERED this 7<sup>th</sup> day of November, 2013.

Lincoln M. Wood  
UNITED STATES DISTRICT JUDGE

Copy to:

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Assistant United States Attorney  
U.S. Attorney's Office  
for the Southern District of New York  
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