

other filings are permitted from other persons or entities.

2. Ralph S. Janvey, Receiver of the assets and records of Stanford Group Company, Stanford Trust Company, Ltd., Stanford Fiduciary Investor Services, Inc., and related entities, is found at 2100 Ross, Suite 2600, Dallas, Texas 75201, within the jurisdiction of this Court.

3. As explained in the Declaration of Internal Revenue Agent Daniel Reeves attached to the Appendix at APP 1-35, and exhibits thereto, the Internal Revenue Service is conducting an investigation into United States taxpayers as part of its Offshore Compliance Initiative. The Offshore Compliance Initiative develops projects, methodologies, and techniques for identifying U.S. taxpayers who are involved in offshore transactions and financial arrangements for tax avoidance purposes. Specifically, the IRS is now investigating United States taxpayers who, as clients of SGC, a U.S. registered broker dealer, or Stanford Trust Company, Ltd., an affiliated trust company based in Antigua, directly or indirectly held interests in or had signature or other authority over financial accounts at SGC's affiliate offshore bank, Stanford International Bank, Ltd., or directly or indirectly held a beneficial ownership interest in a corporation, trust, foundation, or other entity formed by or managed through Stanford Trust Company, Ltd., and who are likely not complying with U.S. internal revenue laws requiring the disclosure of interests held in foreign accounts and the reporting of income earned on the foreign financial accounts.

4. In furtherance of this investigation, the Internal Revenue Service, once service of the summons is authorized by the Court, will issue under the authority of 26 U.S.C. § 7602 an administrative "John Doe" summons to Ralph S. Janvey, Receiver of the assets and records of SGC, Stanford Trust Company, Ltd., Stanford Fiduciary Investor Services, Inc., and related entities. A copy of the summons is attached as Exhibit A to the Declaration of Internal Revenue

Agent Daniel Reeves at APP 37-56.

5. An order authorizing service of an Internal Revenue Service “John Doe” summons is warranted under the three part test of 26 U.S.C. § 7609. First, 26 U.S.C. § 7609(f)(1) is satisfied because the “John Doe” summons relates to the investigation of an ascertainable group or class of persons, that is, United States taxpayers who were clients of SGC or Stanford Trust Company, Ltd., at any time during years 2002 through 2008 and who:

- a. directly or indirectly had an interest in or signature or other authority over any financial account maintained at, monitored by or managed through Stanford International Bank, Ltd.; or
- b. directly or indirectly held a beneficial ownership interest in a corporation, trust, foundation or other entity formed by or managed through Stanford Trust Company, Ltd.

Second, 26 U.S.C. § 7609(f)(2) is satisfied as there is a reasonable basis for believing that such group or class of persons may fail, or may have failed, to comply with one or more provisions of the Internal Revenue laws. Finally, 26 U.S.C. § 7609(f)(3) is established as the information sought to be obtained from the examination of the records or testimony (and the identity of the persons with respect to whose tax liabilities the summonses have been issued) is not readily available from other sources.

6. In support of this Petition, the United States has filed its Memorandum of Law and an Appendix that includes the declaration under 28 U.S.C. § 1746 of Internal Revenue Agent Daniel Reeves and the exhibits attached thereto, and the declaration of Paul Rolli, a Supervisory Revenue Service Representative for the IRS.

WHEREFORE, the United States respectfully requests:

- A. That this Court enter an order permitting service of an Internal Revenue Service “John Doe” summons to Ralph S. Janvey, Receiver of the assets and records of Stanford Group Company, Stanford Trust Company, Ltd., Stanford Fiduciary Investor Services, Inc., and related entities, in substantially the form as attached as Exhibit A to the Declaration of Daniel Reeves at APP 37-56; and
- B. That this Court grant such other and further relief to which the United States may be entitled.

DATED this 30th day of November, 2009.

Manuel P. Lena Jr.

/s/ Manuel P. Lena Jr.

Manuel P. Lena Jr.

Texas Bar No. 12201255

Michael D. Powell

Bar No. 287121-Florida

Joseph A. Pitzinger III

Bar # 16055800

Attorneys, Tax Division

U. S. Department of Justice

717 N. Harwood, Suite 400

Dallas, Texas 75201

214/880-9750 or 9721[9741fax]

manuel.p.lena@usdoj.gov

michael.d.powell@usdoj.gov

Attorneys for United States (IRS)