

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA

IN THE MATTER OF THE TAX)
LIABILITIES OF:)

Civil Action No. 13-1066

JOHN DOES, Norwegian taxpayers holding)
PNC Bank, N.A.)
payment card XXXXXXXXXXXXX2075 and)
RBS Citizens, N.A.)
payment card XXXXXXXXXXXXX5082.)

ORDER

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 PNC Bank, N.A. and RBS Citizens, N.A. relate to the investigation of particular persons or ascertainable groups or classes of persons, that there is a reasonable basis for believing that such persons or groups or classes 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 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 Cheryl Kiger or any other authorized officer or agent, may serve Internal Revenue Service "John Doe" summonses upon PNC Bank, N.A. and RBS Citizens, N.A. in substantially the form as attached as Exhibits A and B to the Declaration of Revenue Agent Cheryl Kiger. A copy of this Order shall be served together with the summonses.

DONE AND ORDERED this 24th day of July, 2013.

Kara Barry Pender
UNITED STATES DISTRICT JUDGE