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NORTHERN DISTRICT OF CALIFORNIA

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UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

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 CIBC FirstCaribbean)
International Bank Limited, its predecessors,)
subsidiaries, and affiliates (collectively,)
FCIB) and financial accounts maintained at,)
monitored by, or managed through other)
financial institutions that FCIB permitted to)
transact client business through its United)
States correspondent account at Wells Fargo)
Bank, N.A.)

Civil Number:
CV 13 1938

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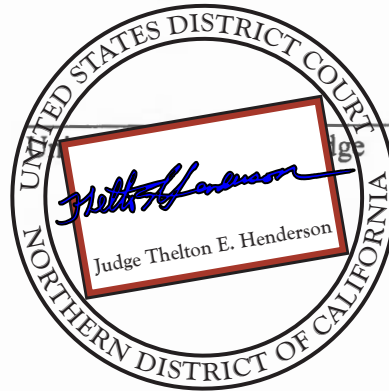
**~~PROPOSED~~ ORDER GRANTING EX
PARTE PETITION FOR LEAVE TO
SERVE "JOHN DOE" SUMMONS**

THIS MATTER is before the Court upon the United States of America's "*Ex Parte* Petition for Leave to Serve "John Doe" Summons" (the "Petition"). Based upon a review of the Petition and supporting documents, the Court has determined that the "John Doe" summons to Wells Fargo Bank, N.A. 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 has failed or may have failed to comply with any provision of any internal revenue laws, and that the information sought to be obtained from the

1 examination of the records or testimony (and the identities of the persons with respect to whose liability
2 the summons is issued) are not readily available from other sources. It is therefore:

3 ORDERED AND ADJUDGED that the Internal Revenue Service, through Revenue Agent
4 Cheryl R. Kiger or any other authorized officer or agent, may serve an Internal Revenue Service "John
5 Doe" summons upon Wells Fargo Bank, N.A. in substantially the form as attached as Exhibit A to
6 Declaration of Cheryl R. Kiger. A copy of this Order shall be served together with the summons.

7 IT IS SO ORDERED this 29th day of April, 2013.



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11 Presented by:

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13 Assistant Attorney General

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