

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

IN THE MATTER OF THE TAX
LIABILITIES OF: JOHN DOES,

Case No. 1:15-mc-23475

United States taxpayers who, at any time during the years ended December 31, 2006, through December 31, 2014, 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 Belize Bank International Limited (“BBIL”) or Belize Bank Limited (“BBL”), or Belize Corporate Services Limited (“Belize Corporate Services”), their predecessors, subsidiaries, and affiliates, and financial accounts maintained at, monitored by, or managed through other financial institutions that BBIL, BBL, or Belize Corporate Services permitted to transact client business through their United States correspondent accounts at Bank of America, National Association or Citibank, National Association

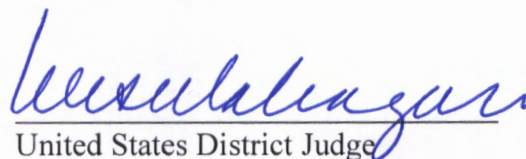
**ORDER GRANTING *EX PARTE* PETITION FOR LEAVE TO SERVE
“JOHN DOE” SUMMONSES**

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 Bank of America, N.A., and Citibank, N.A., 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 laws,

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 Michael Frazier or any other authorized officer or agent, may serve Internal Revenue Service "John Doe" summonses upon Bank of America, N.A., and Citibank, N.A., in substantially the form as attached as Exhibits 10 and 11 to Declaration of Michael Frazier. A copy of this Order shall be served together with the summonses.

IT IS SO ORDERED this 16 day of Sept., 2015.


United States District Judge

Presented by:

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