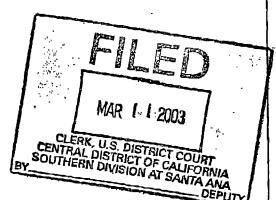
DEBRA W. YANG
United States Attorney
EDWARD M. ROBBINS, JR.
Assistant United States Attorney
Chief, Tax Division
ROBERT F. CONTE (SBN 157582)
Assistant United States Attorney
Room 7211 Federal Building
300 North Los Angeles Street
Los Angeles, California 90012
Telephone: (213) 894-6607
Facsimile: (213) 894-0115

Attorney for United States of America



UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

v.

Plaintiff,

 N_0 . S_AA_V 03-025

NOTICE TO COUNSEL OF EX PARTE APPLICATION

SAMUEL DEANGELO, JOE GORDON SHIELDS, a/k/a, GORDON SHIELDS, ALAN M. HOVEY, JEFFERY R. WRIGHT, KELLY DAVID, a/k/a, DAVID KELLY; and WESTERN TAX SERVICES, INC.

Defendants

Derendanca

NOTICE TO COUNSEL

Pursuant to local rules, counsel for plaintiff attempted to contact counsel for defendants to give notice of plaintiff's exparte application as follows:

Counsel for Sam DeAngelo and Western Tax Services, Inc.

On March 10, 2003, in the morning, counsel for plaintiff attempted to contact attorney Paul Raymond at his office at (949)

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 476-2197 to advise him of the ex parte application. I heard back from Mr. Raymond later in the day and he indicated that he opposed the application. Counsel for Joe Gordon Shields On March 10, 2003, in the morning, counsel for plaintiff

attempted to contact attorney Steven Toscher at his office at (310) 273-1181 to advise him of the ex parte application. heard back from Mr. Toscher's office later in the day and they indicated that Mr. Toscher opposed the application.

Counsel for Allen Hovey, Jeffrey Wright, and Kelly David On March 10, 2003, in the morning, counsel for plaintiff attempted to contact attorney Michael Bruggeman at his office at I heard back from Mr. Bruggeman later in the day (949) 475-1886. and he indicated that he opposed the application.

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Respectfully submitted,

DEBRA W. YANG United States Attorney EDWARD M. ROBBINS, JR.

Assistant United States Attorney

Tax Division

ROBERT F.

Assistant United States Attorney

PROOF OF SERVICE

I am over the age of 18 and not a party to the within action. I am employed by the Office of the United States Attorney, Central District of California. My business address is 300 North Los Angeles Street, Suite 7211, Los Angeles, CA 90012.

On March 10, 2003, I served, Notice to Counsel of Exparte Application, on each person or entity named below by enclosing a copy in an envelope addressed as shown below and placing the envelope for collection and mailing on the date and at the place shown below following our ordinary office practices. I am readily familiar with the practice of this office for collection and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid.

Date of mailing: March 10, 2003. Place of mailing: Los Angeles, California.

See attached Service List

I declare under penalty of perjury under the laws of the United States of America that the foregoing if true and correct.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on: March 10, 2003 at Lds Angeles, Callif

Sasa L. Sidhu

Service List

Paul William Raymond 5120 Campus Drive Newport Beach, C.A., 92660-2101

Steven Richard Toscher Hochman Salkin Rettig et al. 9150 Wilshire Blvd., #300 Beverly Hills, C.A., 90212-3414

Michael R. Bruggeman 5120 Campus Drive Newport Beach, C.A., 92660

Courtesy Copy: Service via Mail or Interoffice Distribution

Robert S. Watkins, Esquire Chief, Civil Trial Section Western Region P.O. Box 683 Ben Franklin Station Washington, D.C. 20044