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8 *Attorneys for United States of America*

9 UNITED STATES DISTRICT COURT FOR THE  
10 NORTHERN DISTRICT OF CALIFORNIA

11 IN THE MATTER OF THE TAX )  
LIABILITIES OF: )  
12 )  
1 J H N D E S, United States person(s), who )  
1 directly or indirectly hold authority over any )  
combination of accounts held with P y w r )  
14 Ventures Inc., /b/ Kr ken or Kr ken.com, or )  
its predecessors, subsidiaries, divisions, or )  
15 affiliates (collectively, "Kr ken"), with total )  
16 assets the equivalent of \$20,000 in value of )  
transactions (regardless of type) in )  
17 cryptocurrency in any one year, for the period )  
January 1, 2016 through December 31, 2020. )

Civil Number:

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

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18 THIS MATTER is before the Court upon the United States of America's "Ex Parte Petition for  
19 Leave to Serve "John Doe" Summons" (the "Petition"). Based upon review of the Petition and  
20 supporting documents, the Court has determined that the "John Doe" summons to P y w r Ventures,  
21 Inc., and Subsidiaries relates to the investigation of an ascertainable group or class of persons, that there  
22 is a reasonable basis for believing that such group or class of persons has failed or may have failed to  
2 comply with any provision of any internal revenue laws, that the information sought to be obtained from  
24 the examination of the records (in the identities of the persons with respect to whose liability the  
25 summons is issued) is not readily available from other sources, and that the information sought to be  
26 obtained is narrowly tailored to information that pertains to the failure or potential failure of that group  
27 or class of persons to comply with one or more provisions of the internal revenue laws. It is therefore:

[Proposed Order Granting Ex Parte Petition  
For Leave to Serve "John Doe" Summons 1

ORDERED AND ADJUDGED that the Internal Revenue Service, through Revenue Agent  
2 Karen Cincott or any other authorized officer or agent, may serve on Internal Revenue Service John  
3 Doe summons upon P yw r Ventures, Inc., and Subsidiaries in substantially the form set forth in  
4 Exhibit A to the Declaration of Karen Cincott. A copy of this order shall be served together with the  
5 summons.

6 IT IS SO ORDERED this \_\_\_\_ day of 1\_\_\_\_\_, 2021.

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10 UNITED STATES DISTRICT JUDGE