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Attorneys for the United States

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH

) Case No. 2:16-cv-00370-JNP
) STIPULATION FOR ENFORCEMENT) OF SUMMONSES
)
)
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Comes now the United States of America and the petitioner International Automated Systems, Inc., by and through their undersigned counsel, to hereby stipulate as follows:

1. On April 14, 2016, pursuant to 26 U.S.C. §§ 7602 and 7603, the IRS issued an administrative summonses to Zions Bank. The summons directed Zions Bank to produce "copies of signature cards, monthly bank statements, bank deposits slips, deposit items, credit memos, cancelled checks, and debit memos drawn on accounts which International Automated Systems, Inc (TIN #xx-xxx7580) owns for the period June 2012-July 2013." The summons

issued to Zions Bank may be enforced for any accounts of International Automated Systems, Inc. for which Neldon and Glenda Johnson are not signatories.

- 2. On April 14, 2016, pursuant to 26 U.S.C. §§ 7602 and 7603, the IRS issued an administrative summonses to Wells Fargo Bank. The summons directed Wells Fargo Bank to produce "copies of signature cards, monthly bank statements, bank deposits slips, deposit items, credit memos, cancelled checks, and debit memos drawn on accounts which International Automated Systems, Inc (TIN #xx-xxx7580) owns for the period June 2012-July 2013." The summons issued to Wells Fargo Bank may be enforced for any accounts of International Automated Systems, Inc. for which Neldon and Glenda Johnson are not signatories. Additionally, the summons issued to Wells Fargo Bank may be enforced for bank account xxxx4687 for the period February 1, 2013 through July 31, 2013.
- 3. On April 14, 2016, pursuant to 26 U.S.C. §§ 7602 and 7603, the IRS issued an administrative summonses to Bank of American Fork. The summons directed Bank of American Fork to produce "copies of signature cards, monthly bank statements, bank deposits slips, deposit items, credit memos, cancelled checks, and debit memos drawn on accounts which International Automated Systems, Inc (TIN #xx-xxx7580) owns for the period June 2012-July 2013." The summons issued to Bank of American Fork may be enforced for any accounts of International Automated Systems, Inc. for which Neldon and Glenda Johnson are not signatories.

Additionally, the summons to Bank of American Fork may be enforced for bank account xxxx4148 for the period February 1, 2013 through July 31, 2013.

JOHN W. HUBER United States Attorney

JOHN K. MANGUM Assistant United States Attorney

/s/ Virginia Cronan Lowe VIRGINIA CRONAN LOWE Trial Attorney, Tax Division U.S. Department of Justice P.O. Box 683 Ben Franklin Station Washington, D.C. 20044-0683 Telephone: (202) 307-6484

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CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that service of the foregoing STIPULATION FOR ENFORCEMENT OF SUMMONSES has been made this 15th day of November, by US Mail, postage prepaid to:

Zions Bank Legal Department 1875 S Redwood Road Salt Lake City, UT 84104

Bank of American Fork P.O. Box 307 American Fork, UT 84003

Wells Fargo Bank 2700 S. Price Road, 2nd Floor Chandler, AZ 85286

> /s/ Virginia Cronan Lowe VIRGINIA CRONAN LOWE Trial Attorney, Tax Division United States Department of Justice