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IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH

DCL16BLT, INC.)
Petitioner,) Case No. 2:16-cv-00754-DN
V.) STIPULATION FOR ENFORCEMENT OF SUMMONSES
)
UNITED STATES OF AMERICA,)
Defendant.)

Comes now the United States of America and the petitioner DCL16BLT, Inc., by and through their undersigned counsel, to hereby stipulate as follows:

1. On June 16, 2016, pursuant to 26 U.S.C. §§ 7602 and 7603, the IRS issued an administrative summons 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 DCL16BLT, Inc. (TIN #xx-xxx1997), or its wholly owned limited liability company, RaPower-3 LLC (TIN # XX-XXX2043) owns for the period December 2012-January 2015." The summons issued to Zions Bank may be enforced for any accounts of DCL16BLT, Inc., or its wholly owned limited

liability company, RaPower-3 LLC, opened after January 31, 2013 and through January 31, 2015.

- 2. On June 16, 2016, pursuant to 26 U.S.C. §§ 7602 and 7603, the IRS issued administrative summonses to Wells Fargo Bank. The summons directed the 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 DCL16BLT, Inc. (TIN #xx-xxx1997), or its wholly owned limited liability company, RaPower-3 LLC (TIN #XX-XXX2043) owns for the period December 2012-January 2015." The summons issued to Wells Fargo Bank may be enforced for any accounts of DCL16BLT, Inc., or its wholly owned limited liability company, RaPower-3 LLC, for which Neldon and Glenda Johnson are not signatories. Additionally, the summons issued to Wells Fargo Bank may be enforced for bank accounts xxxx2620 and xxxx4501 for the period February 1, 2013 through January 31, 2015.
- 3. On June 16, 2016, pursuant to 26 U.S.C. §§ 7602 and 7603, the IRS issued administrative summonses to Millard County Credit Union. The summons directed Millard County Credit Union 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 DCL16BLT, Inc. (TIN #xx-xxx1997), or its wholly owned limited liability company, RaPower-3 LLC (TIN # XX-XXX2043) owns for the period December 2012-January 2015." The summons issued to Millard County Credit Union may be enforced for any accounts of DCL16BLT, Inc., or its wholly owned limited liability company, RaPower-3 LLC, for which

Neldon and Glenda Johnson are not signatories. Additionally, the summons issued to Millard County Credit Union may be enforced for bank account xxxx5802-1 for the period February 1, 2013 through January 31, 2015.

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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Attorney for Petitioner

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

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

Millard County Credit Union 109 S 300 East Delta, UT 84624

/s/ Virginia Cronan Lowe
VIRGINIA CRONAN LOWE
Trial Attorney, Tax Division
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