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16 Attorneys for United States of America

17 UNITED STATES DISTRICT COURT FOR THE  
18 NORTHERN DISTRICT OF CALIFORNIA

19 IN THE MATTER OF THE TAX )  
20 LIABILITIES OF: )  
21 JOHN DOES, United States persons who, )  
at any time during the period January 1, 2013, )  
22 through December 31, 2015, conducted )  
transactions in a convertible virtual currency )  
23 as defined in IRS Notice 2014-21. )  
24 \_\_\_\_\_ )

Civil Number: 3:16-cv-06658-JSC

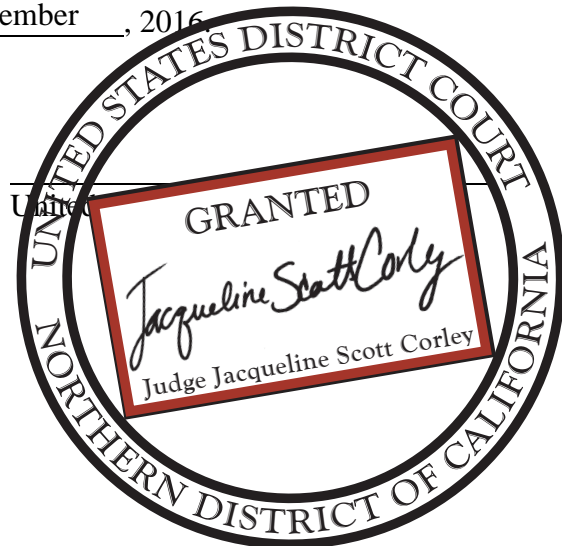
~~PROPOSED~~ ORDER GRANTING  
EX PARTE PETITION FOR LEAVE TO  
SERVE "JOHN DOE" SUMMONS

25 THIS MATTER is before the Court upon the United States of America's "Ex Parte Petition for  
26 Leave to Serve "John Doe" Summons" (the "Petition"). Based upon a review of the Petition and  
27 supporting documents, the Court has determined that the "John Doe" summons to Coinbase, Inc. relates

1 to the investigation of an ascertainable group or class of persons, that there is a reasonable basis for  
2 believing that such group or class of persons has failed or may have failed to comply with any provision  
3 of any internal revenue laws, and that the information sought to be obtained from the examination of the  
4 records or testimony (and the identities of the persons with respect to whose liability the summons is  
5 issued) are not readily available from other sources. It is therefore:

6 ORDERED AND ADJUDGED that the Internal Revenue Service, through Senior Revenue  
7 Agent David Utzke or any other authorized officer or agent, may serve an Internal Revenue Service  
8 John Doe summons upon Coinbase, Inc. in substantially the form as attached as Exhibit B to Declaration  
9 of Senior Revenue Agent David Utzke. A copy of this Order shall be served together with the  
10 summons.

11 IT IS SO ORDERED this 30th day of November, 2016.



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16 Presented by:

17 CAROLINE D. CIRAOLO  
18 Principal Deputy Assistant Attorney General

19 /s/ Jeremy N. Hendon

20 /s/ Amy Matchison

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24 Northern District of California

25 /s/ Colin C. Sampson

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