

**ORIGINAL**

1 App.disclose

2 LEONARDO M. RAPADAS  
United States Attorney  
3 KARON V. JOHNSON  
Assistant U.S. Attorney  
4 Suite 500, Sirena Plaza  
108 Hernan Cortez Avenue  
5 Agana, Guam 96910  
Telephone: (671) 472-7332/7283  
6 Telecopier: (671) 472-7334

7 Attorneys for United States of America

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE TERRITORY OF GUAM**

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11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 vs.  
14 JI EON LEE,  
15 Defendant.

CRIMINAL CASE NO. 08-00016

UNITED STATES APPLICATION TO  
DISCLOSE CERTAIN TAX  
INFORMATION

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COMES NOW the United States of America, by and through undersigned counsel, and moves this Honorable Court for an order allowing the government to disclose certain records obtained from the Internal Revenue Service (IRS). On November 21, 2006, the court issued an Order, Misc. Case No. 06-00033, directing the IRS to disclose to the U.S. Attorney's Office any information it held on Taxpayer Identification Number XXX-XX-7064, among others. Defendant Lee was indicted in the above-entitled matter on February 20, 2009, and made her initial appearance February 26, 2008. She is represented by Howard Trapp. The government seeks permission to release the IRS data concerning the TINs which were the subject of this order, so that Mr. Trapp can evaluate the strength of the government's case. The release of such information is allowed by Title 26, United States Code, § 6103((i)(4)(A)(i) as information

**FILED**  
DISTRICT COURT OF GUAM


FEB 27 2008 *JS*

**JEANNE G. QUINATA**  
Clerk of Court

1 “probative of a matter in issue relevant in establishing the commission of a crime or the guilt or  
2 liability of a party.”

3 Respectfully submitted this 27<sup>th</sup> day of February, 2008.

4 LEONARDO M. RAPADAS  
5 United States Attorney  
6 Districts of Guam and NMI

7 By:   
8 KARON V. JOHNSON  
9 Assistant U.S. Attorney  
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