

### **Statement of IRS Commissioner Mark W. Everson**

"Today's action represents an important step in enforcing the tax law. The promoters of potentially abusive tax avoidance transactions know the tax code requires them to keep investor lists and to provide those lists to the IRS on request. We are seeking nothing more or less than adherence to the law."

### **Statement of IRS Chief Counsel B. John Williams**

"Our efforts to curb potentially abusive tax avoidance transactions depend on our ability to obtain and use a web of information about these transactions and those who invest in and promote them. As part of our efforts, we have, and will, issue summonses to law firms, accounting firms, investment banks and others who may have been involved in the promotion of questionable transactions."

"We will use all tools available to us to ensure that promoters and investors are complying with the tax laws and will not hesitate to serve John Doe summonses, in addition to regular summonses, to make sure that we preserve the statute of limitations for investors. We will not allow investors and promoters to use stalling tactics to circumvent our compliance efforts."