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The court has reviewed the applicable legal standards and, good cause appearing, concludes that it is appropriate to adopt the proposed Findings and Recommendations in full.

Accordingly, IT IS ORDERED that:

1. The proposed Findings and Recommendations filed August 8, 2019, are adopted.
2. The IRS summons served upon respondent Brian Torrance is enforced.
3. Torrance is ordered to appear before Revenue Agent David Palmer (or his designated representative), at a time and location set in writing by Agent Palmer, on the twenty-eighth day after the filing date of this order, or a later date to be set in writing by Agent Palmer. Torrance shall give testimony, and produce for examination and copying the books, checks, records, papers and other data demanded by the summons.

Dated: October 3, 2019

/s/ John A. Mendez
HONORABLE JOHN A. MENDEZ
United States District Court Judge