

**UNITED STATES TAX COURT  
WASHINGTON, DC 20217**

|                                   |   |                     |
|-----------------------------------|---|---------------------|
| AMNESTY NATIONAL,                 | ) |                     |
|                                   | ) |                     |
| Petitioner,                       | ) |                     |
|                                   | ) |                     |
| v.                                | ) | Docket No. 4570-17. |
|                                   | ) |                     |
| COMMISSIONER OF INTERNAL REVENUE, | ) |                     |
|                                   | ) |                     |
| Respondent                        | ) |                     |
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**ORDER**

On June 26, 2018, the undersigned held a conference call with Darlene Esposito (the sole shareholder and only officer of Amnesty National) and counsel for respondent. It was agreed that trial would commence on Monday, September 24, 2018, in Washington, D.C. The parties further agreed on dates for the exchange of documents and for the lodging/filing of a Stipulation of Facts to be filed with the Court.

The premises considered, it is hereby

ORDERED that this case is set for trial at a Special Session of the Court to be held on Monday, September 24, 2018, at 10:30 a.m., in the North Courtroom, United States Tax Court, 400 2<sup>nd</sup> Street, NW, Washington, D.C. 20217. It is further

The parties shall exchange all documents (relevant to this case) each intends to introduce into the record by August 24, 2018. It is further

ORDERED that the parties shall lodge/file with the Court a Stipulation of Facts, together with exhibits attached thereto, by September 10, 2018.

**Petitioner is warned that in the event it (or an officer, director, or managing agent of petitioner) does not fully comply with the provisions of this Order the Court may impose sanctions against petitioner, including an Order that (1) petitioner will be prohibited from offering evidence to rebut the determinations made in the notice of deficiency issued to it, (2) the assignment of error set forth in the petition will be struck, and/or (3) such other and further relief as the Court deems proper.**

This Order constitutes official notice of the same to the parties.

**(Signed) Julian I. Jacobs  
Judge**

Dated: Washington, D.C.  
June 27, 2018