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8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF ARIZONA

10 United States of America,  
11  
12 Plaintiff,  
13  
14 v.  
15 Janice Sue Taylor,  
16  
17 Defendant.

No. CR-10-0400-PHX-DGC  
**NOTICE OF INTENT TO  
INTRODUCE EXPERT TESTIMONY**

18 The United States, through undersigned counsel, notifies Defendant pursuant to  
19 Fed.R.Crim.P. 16(a)(1)(E) and Rule 702 of the Federal Rules of Evidence that it intends to  
20 introduce at trial expert testimony from IRS Revenue Agent Cheryl Bradley.

21 Defendant was first notified in writing on August 18, 2010, that the United States  
22 intended to present expert testimony at trial regarding Defendant's tax liability. Later, on  
23 November 15, 2010, the United States notified Defendant in writing that its expert witness would  
be Ms. Bradley and provided a copy of her resume. The United States also summarized her  
testimony as follows:

24 At this point, we intend to present IRS Revenue Agent Cheryl Bradley to testify  
25 about 1) your income during the prosecution years and the federal income tax  
26 consequences thereof, 2) the sham or nominee nature of the various trusts and  
27 other entities created by or related to you, and 3) the flow of funds between the  
28 various entities and third parties. The discovery already provided contains draft  
charts and summaries regarding these matters. Ms. Bradley's testimony will be  
based on these drafts as well as any additional evidence presented at trial.

1           Undersigned counsel met with Ms. Bradley on March 9, 2011, to review trust records for  
2 some of the entities used in the tax evasion scheme. Ms. Bradley has worked as an IRS revenue  
3 agent since 1987 and has special expertise in trusts; from 1999 through 2003 she was assigned  
4 to audit suspicious trust records and answer taxpayer questions over the phone on how to file  
5 trust returns. With respect to the trust records, the United States anticipates that Ms. Bradley will  
6 opine that 1) the trusts are grantor trusts, which are not recognized for tax purposes; 2)  
7 Defendant retained control of the income flowing through the trusts, so it would be taxable to  
8 her; 3) Defendant's attempts to assign her income to others is also not recognized for tax  
9 purposes; and 4) based on Ms. Bradley's experience, the trust records are consistent with an  
10 attempt to hide income from the IRS.

11  
12                               Respectfully submitted this 11<sup>th</sup> day of March, 2011.

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14   DENNIS K. BURKE  
15   United States Attorney  
16   District of Arizona

17   *s/Frank T. Galati*

18   FRANK T. GALATI

19   *s/James R. Knapp*

20   JAMES R. KNAPP  
21   Assistant U.S. Attorneys

22           Certificate of Service

23           I hereby certify that on 3/11/2011, I electronically transmitted the attached document to the  
24 Clerk's Office using the CM/ECF system for filing and transmittal of a Notice of Electronic  
25 Filing to the following CM/ECF registrants:

26           Susan Anderson

27           In addition, I mailed copies of the attached document to the following:

28           Janice Sue Taylor  
          3341 Arianna Ct.  
          Gilbert, AZ 85298