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9 *Attorneys for the United States of America*

10
11 IN THE UNITED STATES DISTRICT COURT
12 DISTRICT OF ARIZONA

13 UNITED STATES OF AMERICA,

14 Plaintiffs,

15 v.

16 JAMES LESLIE READING, CLARE L.
READING, FOX GROUP TRUST,
17 MIDFIRST BANK, CHASE, FINANCIAL
LEGAL SERVICES, STATE OF ARIZONA

18 Defendants.
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Civ. No. 11-0698-PHX-FJM

**UNITED STATES' INITIAL
DISCLOSURES UNDER FEDERAL
RULE OF CIVIL PROCEDURE 26(a)(1)**

21 The United States, the plaintiff in this matter, hereby makes its disclosures under Federal Rule
22 of Civil Procedure 26(a)(1).

23 **A. Disclosures Regarding Individuals Who are Likely to have Discoverable Information
(F.R.C.P. 26(a)(1)(A)(i)).**

24 **1. Regarding the Tax Liability Claims (the First Through Fifth Claims in the
25 Complaint).**

26 At this point, prior to discovery, it is possible that the following may have such information:
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28

- 1 a. Defendants James and Clare Reading
2 (The Readings can be contacted
3 through their attorney, Tommy K. Cryer,
4 who has entered an appearance herein);¹ and
5 b. Internal Revenue Service employees
6 in Arizona
7 (Contact through the undersigned
8 Government Counsel).

9 **2. Regarding the Foreclosure-Related Claims (the Sixth Through Eighth Claims in
10 the Complaint).**

11 At this point, prior to discovery, it is possible that the following may have such information:

- 12 a. Defendants James and Clare Reading
13 (The Readings can be contacted
14 through their attorney, Tommy K. Cryer,
15 who has entered an appearance herein);
16 b. Internal Revenue Service employees in Arizona
17 (Contact through the undersigned
18 Counsel);
19 c. Trustees and representatives of the
20 Fox Group Trust
21 (Identities and Addresses known to defendants
22 James and Clare Reading and the
23 Fox Group Trust);
24 d. Doug Carpa may have knowledge
25 about the interest of defendant Financial Legal
26 Services in the subject real property
27 (Phone number: (480) 838-1518);
28 e. Mike Bloomquist may have knowledge
about the interest of defendant Financial Legal
Services in the subject real property
(Phone number: (623) 376-7932); and
f. Robert Stanford may have knowledge
about the interest of defendant Financial Legal
Services in the subject real property
(Mr. Stanford's phone number and address are
unknown to the United States at this point).

¹ At this point, it is unknown whether the Readings had assistance from others concerning the preparation of documents that they filed with the IRS or which are otherwise relevant herein.

1 **B. Disclosures Regarding Documents (F.R.C.P. 26(a)(1)(A)(ii)).**

2 The United States may use non-privileged documents furnished by the IRS, including tax
3 returns, administrative reports, correspondence and a transcript of account. Certain documents that
4 relate to some or all of the claims in the complaint are in possession of the undersigned Government
5 counsel.

6 **C. Disclosures Regarding F.R.C.P. 26(a)(1)(A)(iii).**

7 The United States does not claim any damages in this case. The Government is seeking a
8 judgment for taxes and to foreclose its federal tax liens on certain real property.

9 **D. Disclosures Regarding F.R.C.P. 26(a)(1)(A)(iv).**

10 Not applicable.

11 Dated this 18th day of August, 2011.

13 DENNIS K. BURKE
14 United States Attorney

15 /s/ Charles M. Duffy
16 CHARLES M. DUFFY
17 Trial Attorney, Tax Division
18 U.S. Department of Justice
19 *Attorneys for the United States of America*
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 18th day of August, 2011, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system and mailed by U.S. Postal Service the foregoing to the following:

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/s/ Charles M. Duffy
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