

United States District Court

NORTHERN DISTRICT OF GEORGIA

In the Matter of the Search of

(Name, address or brief description of person or property to be searched)

APPLICATION AND AFFIDAVIT FOR SEARCH WARRANT

1560 Fieldgreen Overlook
Stone Mountain, Georgia 30088, more particularly described
as a Brick Two-Story Single Family Dwelling with basement
and attached garage.

CASE NUMBER: 1:04-M-1011-LTW

I, Wesley Cooper, being duly sworn depose and say:

I am Special Agent Wesley Cooper of the Internal Revenue Service and have reason to believe that on the property
or premises known as:

1560 Fieldgreen Overlook
Stone Mountain, Georgia 30088, more particularly described as a brick two-story single family dwelling with
basement and attached garage.

in the Northern District of Georgia, there is now concealed a certain person or property, namely:

See Attachment A

which is property which constitutes evidence of the commission of a criminal offense, and property which has been used
as the means of committing a criminal offense,

concerning a violation of Title 18, United States Code, Section 371, and Title 26 United States Code, §§ 7201, 7203 and
7212. The facts to support a finding of Probable Cause are as follows:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof. Yes No

Wesley Cooper
Signature of Affiant
Wesley Cooper
Special Agent - Internal Revenue Service
Criminal Investigation Division

Sworn to before me, and subscribed in my presence

July 23, 2004 at Atlanta, Georgia
Date City and State

Linda T. Walker, United States Magistrate Judge
Name and Title of Judicial Officer
AUSA Charysse L. Alexander
Linda T. Walker
Signature of Judicial Officer

EXHIBIT "A"

ATTACHMENT A

ITEMS TO BE SEIZED

Search and seize the following items whether in written or electronic format:

1. Documents and records related to the income and expenses of Colin L. Jackson and Sherry Peel Jackson for the periods of 2000 - 2004, including financial and banking records, rolodex indices and any papers reflecting the names, addresses, and/or telephone numbers of customers, vendors, employees, financial institutions, and any other individuals or businesses with a financial relationship with Colin L. Jackson, Ambassador Investments, Sherry Peel Jackson, Sherry Peel Jackson, CPA, Cameron, Miles & Jackson, Auditors, and Cameron, Miles & Jackson, PC, to correctly determine the taxable income of Colin L. Jackson and Sherry Peel Jackson.

2. Books, records, schedules, memoranda, letters, notes, and/or other correspondence written and/or electronic regarding the activities of Colin L. Jackson and/or Sherry Peel Jackson and their involvement in the following movements and/or organizations from 2000 through 2004:
 - "Give Me Liberty"
 - "Taxable Income"
 - "Theft By Deception"
 - "Original Intent"
 - "Freedom Above Fortune"
 - "Anti-IRS"
 - "Constitutional Income"
 - "Famgardian"
 - "Show Me the Law"
 - "We the People Foundation"
 - "Two City Rally"
 - "18 Month Plan to Eliminate the IRS"

3. Books, records, schedules, memoranda, letters, notes, and/or other correspondence written and/or electronic related to the anti-tax/anti-government involvement of Colin L. Jackson and/or Sherry Peel Jackson with the following individuals for the periods 2000 through 2004:
 - Larkin Rose
 - Joseph Bannister
 - Gene Chapman
 - Paul Chappell
 - John Turner
4. Any and all bills, invoices, receipts, bank records, cancelled checks and other documentation relative to income received, services rendered and/or expenses incurred by Colin L. Jackson and/or Sherry Peel Jackson from the above listed movements/organizations, individuals and/or entities for the periods 2000 - 2004.
5. Documents for the period of 2000 - 2004 relating to the involvement of Colin L. Jackson and/or Sherry Peel Jackson in the formation/creation of the following websites: Theft-By-Deception.com; TaxableIncome.net; and 861Evidence.com.
6. Documents relating to the formation/creation and operation of any and all business entities of Colin L. Jackson and/or Sherry Peel Jackson for the periods 2000 through 2004.
7. Documents showing the use by Colin L. Jackson and/or Sherry Peel Jackson of straw parties or fictitious names to conceal individual and/or business assets and the receipt and/or expenditure of moneys related to same for the periods 2000 through 2004.
8. Indicia of ownership, title, registration and loan records of Colin L. Jackson

and/or Sherry Peel Jackson, of all vehicles, including automobiles, boats, and/or airplanes for the periods 2000 through 2004.

9. Lockboxes, safes, security containers and other receptacles for storing cash and financial instruments held in the names of Colin L. Jackson and/or Sherry Peel Jackson and/or any straw parties, fictitious names and/or nominees of same.
10. Bank safety deposit box records and keys held in the names of Colin L. Jackson and/or Sherry Peel Jackson and/or any straw parties, fictitious names and/or nominees of same.
11. Storage facility records and keys held in the names of Colin L. Jackson and/or Sherry Peel Jackson and/or any straw parties, fictitious names and/or nominees of same.
12. For the period of 2000 – 2004, retained copies of all Federal, state and /or local individual and/or business/trust tax returns, including any and all schedules, all Forms W-2, W-3, W-4, W-9, SS-4, 1099, 1098 and 5498, and any supporting work papers, summary sheets, and analyses used in the preparation of the individual and business/trust tax returns, and Forms W-2, W-3, W-4, W-9, SS-4, 1099, 1098 and 5498;
13. Any and all copies of any publications, research material or other documents or electronic media relating to various anti-tax movements, including but not limited to a DVD entitled "Breaking The Invisible Shackles."
14. Any and all copies of Internal Revenue Service Publications and documents, including all correspondence, manuals, and notices from the IRS to Colin L. Jackson and/or Sherry Peel Jackson and any responses thereto by same.

15. All financial statements, audit/review/compilation reports, accountant and/or tax return information of Colin L. Jackson and/or Sherry Peel Jackson for the periods 2000 through 2004.
16. Any and all correspondence of Colin L. Jackson and/or Sherry Peel Jackson which pertains to tax-advice addressed to and/or from Joseph Bannister, John Turner and Larkin Rose for the periods 2000 through 2004.
17. Records, including all forms of correspondence written and/or electronic and audio recordings whereby Colin L. Jackson and Sherry Peel Jackson supply tax advice and/or discuss tax-related issues for the periods 2000 through 2004.
18. Videotapes, audiotapes, transcripts, pamphlets, brochures, periodicals, newsletters, and correspondence used by Colin L. Jackson and/or Sherry Peel Jackson to market or otherwise promote any tax advice or tax related issues for the periods 2000 through 2004.
19. "Theft-By-Deception" videotapes and Instructional tax manuals related to same.
20. Any and all of the items described in this attachment that are stored in digital form readable by computer whether stored on computer hard drives, diskettes, tapes, or any other computer accessible media. This also includes all copies of any items described above that may be maintained as archive or backup copies. Additionally, if the software or programs that created those records, the agents are authorized to search such software and programs and any documentation and manuals that provide instruction on its installation and use.
21. The agents searching for such information are authorized to search any computer in the premises and to copy all above-described information stored on such computer. The search of such computers shall be limited to seeking the

information described in this attachment.

22. The agents are authorized to seize an image of the hard drive(s) of any computer on the premises, for search off-site. In the event that agents cannot, for technical reasons, obtain access to any computer or cannot search for or copy information contained on that computer, the agents are then authorized to seize such computer, along with any peripheral devices and to remove it to a laboratory setting for analysis. The agents are authorized to seize any removable computer storage media, along with the peripheral devices needed to access that media, to a laboratory setting for analysis. Such devices include, but are not limited to:
- a) Any and all electronic devices which are capable of analyzing, creating, displaying, converting transmitting, or storing electronic or magnetic computer impulses or data. These devices include computers, computer components, computer peripherals, word processing equipment, modems, monitors, printers, plotters, encryption circuit boards, optical scanners, external hard drivers, hard drives, hard disks, floppy disks, laser disks, and other computer related electronic devices.
 - b) Any and all instructions or programs stored in the form of electronic or magnetic media, which are capable of being interpreted by a computer, or related components. The items to be seized could include operating systems, application software, utility programs, compilers, interpreters, and other programs or software used to communicate with computer hardware or peripherals either directly or indirectly via telephone lines, radio or other means of transmission.

All original computers or media seized shall be retained for a sufficient period of time to obtain access to, search for, and recover the information described in this attachment.

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR
SEARCH WARRANT**

I, Wesley Cooper, first being duly sworn, depose and say:

This affidavit is provided in support of, and is incorporated by reference to the Search Warrant and the Application for Search Warrant for the residence of COLIN L. JACKSON & SHERRY PEEL JACKSON, CPA, CFE located at 1560 Fieldgreen Overlook, Stone Mountain, GA 30088.

I. AFFIANT

1. Your affiant is a Special Agent with Criminal Investigation of the Internal Revenue Service, (IRS-CI), assigned to Atlanta Field Office, Group 58-06 in Decatur, Georgia. Your affiant has been employed in this capacity since February 2002. Your affiant has attended and successfully completed the required Criminal Investigator Training and IRS Special Agent Basic Training from the Federal Law Enforcement Center in Brunswick, Georgia.

2. As a Special Agent with the IRS-CI, your affiant has conducted or has been involved in numerous investigations of individuals and businesses alleged to have criminally violated Federal Laws as found in Title 18, Title 26, and Title 31 of the United States Code. In these investigations your affiant has analyzed financial records, interviewed numerous witnesses and prepared summary reports of affiant's investigative findings. Your affiant has participated in the preparation of and execution of search warrants and assisted during judicial proceedings. Your affiant has

1.
EXHIBIT A

discussed this investigation with senior agents and affiant's supervisor, all of whom have extensive investigative experience.

3. This affidavit and Attachment A are submitted to detail the facts and probable cause in support of the application for search warrant for the residence discussed herein in order to secure evidence of the means, instrumentalities, and other evidentiary object of criminal offenses against the United States, namely violations of Title 26, United States Code, Section(s) 7201, 7203, 7212(a) and violations of Title 18, United States Code Section 371.
4. Except as otherwise noted, any facts or circumstances that are mentioned in this affidavit are familiar to your affiant through direct participation in this investigation, your affiant is familiar with all the documents, records and information obtained thus far in this investigation either directly or from the examination of records, discussions with and/or personal observations by your affiant and other Special Agents of the IRS involved in the investigation. Your affiant has also personally gathered information from the internet sites associated with Sherry Peel Jackson and other individuals involved in the anti-tax movement, named www.givemeliberty.org, www.taxableincome.net, www.theft-by-deception.com, www.originalintent.org, www.freedomabovefortune.com, www.anti-irs.com, www.constitutionalincome.com, www.questlive.com, and www.famguardian.org.
5. The premise for which a search warrant is being sought is the residence of Colin L. Jackson and Sherry Peel Jackson which is located at 1560

Fieldgreen Overlook, Stone Mountain, GA 30088. As developed below, the records/documents located in the residence will provide evidence of criminal acts. Your affiant believes that based on the information set forth in this affidavit, a search warrant is necessary to obtain these records/documents as Colin L. Jackson and/or Sherry Peel Jackson may well move or destroy these records to conceal them from the IRS if normal administrative procedures were used to obtain them.

II. PROBABLE CAUSE TO BELIEVE CRIMES HAVE BEEN COMMITTED

6. Colin L. Jackson, 38, is a firefighter with the City of Atlanta Fire Department. Based upon business license information that was obtained from the Division of Internal Auditing and Licensing in DeKalb County, Georgia, it is believed that Colin L. Jackson owns and operates "Ambassador Investments" as a Schedule-C business from the residence located at 1560 Fieldgreen Overlook, Stone Mountain, GA. Sherry Peel Jackson is a former IRS Revenue Agent (GS-512-12), employed in Atlanta for seven years, from 1988 to 1995. Sherry Peel Jackson is currently a self employed CPA, License # CPA009172 (according to the Georgia Secretary of State), and claims to be a Certified Fraud Examiner. Based upon research conducted, via the internet, at the Georgia Secretary of State License website, Sherry Peel Jackson owns and operates Sherry P. Jackson, CPA as an 1120 S Corporation (EIN# 58-2482311) from the residence located at 1560 Fieldgreen Overlook, Stone Mountain, GA. Records obtained during the course of this investigation from financial institutions and searches of the Jackson's discarded trash, as part of this investigation, establish that Sherry Peel Jackson is also

operating "Cameron, Miles & Jackson, Auditors" from this same address. Records from the Georgia Secretary of State and DeKalb County Division of Internal Audit and Licensing indicate that "Cameron, Miles & Jackson, PC, is also operating out of the same address. The Jackson's have two children, Colin II (age 11), and Rayana (age 9) both residing with the Jacksons at 1560 Fieldgreen Overlook, Stone Mountain, GA.

7. The Jacksons' filed federal tax returns with a filing status of Married Filing Jointly from 1988 through 1999. Neither Colin L. Jackson nor Sherry Peel Jackson has filed a federal tax return, either jointly or separately, for the years 2000, 2001 and 2002. Their failure to file the required federal tax returns is based on the Jacksons' claim that the Internal Revenue Code (IRC) § 861 should be used to exempt from federal income tax liability the income of most Americans, including their own. IRC § 861 describes income source rules, that is, the extent to which income earned within the states, and outside the United States, must be reported to Internal Revenue Service. The Jacksons have claimed that IRC § 861 excludes from tax liability most income earned within the United States.

8. The facts set forth in this affidavit show that despite sufficient income to require the filing of tax returns for the years 2000 through 2002, Colin L. Jackson and Sherry Peel Jackson willfully failed to file federal tax returns for those years, either jointly or separately. Neither Colin L. Jackson nor Sherry Peel Jackson has filed any tax return, made a request for extension with regard to filing any tax return or made payment in relation to their filing requirement and/or tax obligation for tax years 2000 to 2002.

9. A summary of relevant information on the Jacksons' jointly filed 1998 and 1999 Forms 1040 are presented on the following table:

COLIN L. & SHERRY PEEL JACKSON'S Filing History for Years 1998 and 1999

<u>Item</u>	<u>Tax Year</u>	
	<u>1998</u>	<u>1999</u>
Wages	\$45,688	\$55,259
Interest Income	66	58
Other Income, refunds, credits, etc.	656	251
<u>Ordinary Dividends</u>	786	
Total IRA Distributions	878	2,878
<u>Schedule C</u>		
Gross Receipts	25,445	163,511
Gross Income	25,245	163,511
Less: Total Expenses	(11,720)	(135,577)
Less: Business Use of Home	0	0
Sch C Business Income	13,715	25,577
Sch E Partnership Income	40,104	(4,234)
Less: ½ SE Tax	(1,776)	(1,926)
Adjusted Gross Income	\$100,117	\$77,863
Less: Itemized Deductions	(32,840)	(31,667)
Less: Exemptions	(10,800)	(11,000)
Taxable Income	\$56,477	\$35,196
Tax	\$10,308	\$5,276
Total Credits	1,280	1,020
Income Tax After Credits	9,028	4,256
SE Tax – Colin & Sherry Jackson	3,551	3,852
Tax on early distribution	0.00	200
Total Tax	\$12,579	\$8,308

Less: Total Tax Payments (4,329) (6,797)

Tax Owed (Refund) \$8,250 \$1,547

10. Your affiant has reviewed information regarding the payment of compensation to Colin L. Jackson and Sherry Peel Jackson in 2000, 2001 and 2002. This information is from IRS databases. IRS records reveal that substantial amounts were paid to Colin L. Jackson and Sherry Peel Jackson between 2000 and 2002.

11. IRS regulations require that any business or individual paying a subcontracted worker for services rendered, issue a Form 1099-MISC identifying the subcontracted worker, their tax identification number and the amount they were compensated. The information contained on Forms W-2, Forms K-1, Forms 1120S and Forms 1099 are also furnished to the IRS for income and expense verification purposes. Your affiant has reviewed the IRS records of the aforementioned documents and has concluded that income verification forms were issued in the names of Colin L. Jackson and Sherry Peel Jackson with the social security numbers of Colin L. Jackson and Sherry Peel Jackson, respectively. There is probable cause to believe that the below listed payments represent compensation for Colin L. Jackson and Sherry Peel Jackson's separate and combined work product. The following schedule represents a compilation of compensation information from IRS databases:

<u>Year</u>	<u>Payer</u>	<u>Sherry Jackson</u>	<u>Colin Jackson</u>	<u>Document Type / Description</u>
2000	Sherry P. Jackson, CPA PC	\$1,115		Form W-2
	Sherry P. Jackson, CPA PC	\$20,737		K-1 1120S
	God First Breakthrough	\$1,000		1099-MISC
	Cameron, Miles & Jackson PC	\$120,493		K-1 1120S
	Karemor International Inc	\$2,117		1099-MISC
	Edward D Jones And Company	\$6,000		1099-R
	Edward D Jones And Company / Stock or Bond	\$4,069		1099-B
	Interest (Multiple Accounts)	\$244		K-1 1041
	Broadcast Traffic & Residuals		\$5,002	W-2
	City of Atlanta		\$48,013	W-2
	Georgia Dept. of Revenue		\$720	1099-G / Prior Yr. Refund
	Total			<u>\$209,510</u>
2001	Cameron, Miles & Jackson PC	\$53,077		K-1 1120S
	3BM	\$1		K-1 1120S
	Edward D. Jones And Company	\$5,000		1099-R
	Edward D. Jones And Company / Stock or Bond	\$250		1099-B
	Interest (Multiple Accounts)	\$498		K-1 1041
	Broadcast Traffic & Residuals		\$4,431	W-2
	City of Atlanta		\$45,212	W-2
Total			<u>\$101,469</u>	
2002	Prudential Financial Inc.	\$3		1099-DIV
	Interest (Multiple Accounts)	\$36		1099-INT
	City of Atlanta		\$40,543	W-2
	City of Atlanta		\$3,900	Other Income / DEF COMP
Total			<u>\$44,482</u>	

12. Colin L. Jackson and Sherry Peel Jackson failed to file individual federal income tax returns for 2000, 2001 and 2002 even though their gross income exceeded the minimum levels required for filing such federal tax returns. Any gross income amount that is above the income levels presented in the chart below requires the filing of federal income tax returns.

Year	Filing Status	Gross Income
2000	Married Filing Jointly (both spouses under age 65)	\$12,950
	Married Filing Separately	\$2,800
2001	Married Filing Jointly (both spouses under age 65)	\$13,400
	Married Filing Separately	\$2,900
2002	Married Filing Jointly (both spouses under age 65)	\$13,850
	Married Filing Separately	\$3,000

13. As detailed above, Colin L. Jackson and Sherry Peel Jackson's gross income level far exceeds the minimum required, either jointly or separately, for filing federal tax returns for each of these three (3) years.

14. The facts show that Sherry Peel Jackson is corruptly interfering with, and impeding, the administration of the internal revenue laws and there is probable cause to believe that she is conspiring to do same with other individuals, namely, Joseph Bannister, Gene Chapman and Larkin Rose. In July of 2003, the IRS notified Colin L. Jackson and Sherry Peel Jackson that the income they earned had to be reported to the IRS. The

Jacksons have persisted, via written correspondence, that the income is not reportable. While both acknowledge they have income, both maintain the claim that this income is not "gross income" as defined in the IRC. As a result, the Jacksons claim to have no federal income tax liability even though courts have uniformly rejected the Section 861 claims as frivolous.

15. On July 21, 2003, computer generated notices were mailed separately to Colin L. Jackson and Sherry Peel Jackson from the IRS Office in Memphis, TN, (Notice #: CP-518). The notice indicated that the Jackson's federal tax returns for the calendar years 2000 and 2001 were overdue.

16. On September 12, 2003, Colin L. Jackson and Sherry Peel Jackson each responded to the notice with written communications entitled "Examination Request." Their responses demanded that the IRS provide each of them with a written determination of their requirement to keep books and records and file returns or collect taxes imposed by Subtitles A & C of the Internal Revenue Code and/or qualified state income tax. Both Colin L. Jackson and Sherry Peel Jackson enclosed "Status and Disclosure Affidavits" with their correspondence. The letters and affidavits were addressed to Internal Revenue Service State-Federal Liaison Officer (Georgia), Jane Brough. The identical letters questioned the authority by which the IRS requires an individual to file federal income tax returns. Governmental Liaison Officer, Jane Brough, responded to both Colin L. Jackson and Sherry Peel Jackson via written correspondence with specific rulings of federal tax law that require individuals to file returns and/or pay income tax.

17. Despite this clear and unequivocal notice from Governmental Liaison Officer Jane Brough, stating that the Jackson's positions were incorrect, Sherry Peel Jackson ignored this notice and has continued to be an avid, public proponent of the frivolous tax § 861 argument.

18. Sherry Peel Jackson advertises her services as a "Certified Public Accountant", "Certified Fraud Examiner" and as a "Lecturer" available for seminars and workshops on numerous anti-tax web sites. There is no evidence to establish that SHERRY JACKSON has her own web site, however, she is featured on many of the anti-tax web sites which include: www.freedomabovefortune.com. A link is provided on this web site which goes to www.showmethelaw.com. A password is required for access to this website; therefore, it is unknown what is available at this site. Other anti-tax websites that have featured Sherry Peel Jackson include: www.taxableincome.net, www.originalintent.org, www.anti-irs.com, www.constitutionalincome.com, and www.theft-by-deception.com.

19. Sherry Peel Jackson has been the featured speaker at various freedom rallies and seminars throughout the country. She speaks about the unconstitutionality of the Federal Income Tax system and how it is illegally operated. Her arguments appear to be the same as those set forth by the We the People Foundation, Gene Chapman and Larkin Rose. In summary, Sherry Peel Jackson advocates the following constitutional and anti-tax arguments during these rallies and seminars:

19.1 That a mandatory/compelled income tax on labor is a slave tax and a violation of the 13th Amendment;

19.2 That the income taxes can only be voluntary and not compelled for American individuals;

19.3 That the conversion of one's personal labor into wages or salaries is not a taxable event;

19.4 That only corporations and its officers are required to pay income Taxes;

19.5 That Americans should challenge the authority of IRS agents to assess and collect taxes; and

19.6 That Americans should initiate a personal lawsuit against any IRS employee attempting to perform an audit or collect taxes

20.A search of discarded trash from the residence of Colin L. Jackson and Sherry Peel Jackson at 1560 Fieldgreen Overlook, Stone Mountain, GA performed on December 16, 2003 revealed documentation indicating that Sherry Peel Jackson was a scheduled featured speaker at the We The People Foundation (WTP) National Conference held January 22-24, 2004, at the Crystal City Marriott, in Arlington, Virginia. An examination of WTP website on January 16, 2004, revealed advertisements for the group's First Annual National Conference along with a detailed agenda of the presenters, speakers and panel guests scheduled to appear at this conference. The list of featured speakers included the following: Sherry Peel Jackson, Larkin Rose, Joseph Banister, Paul Chappell and John Turner.

21. In summary, Sherry Peel Jackson has been featured as a speaker at the following the seminars and or rallies:

21.1 Sherry Peel Jackson presented closing remarks at the Truth-in-Taxation Hearing held in Washington, D.C., in February 2002.

21.2 Sherry Peel Jackson presented a seminar in Atlanta, GA in March of 2002, and the topic was "Individual Master File".

21.3 Sherry Peel Jackson, John Turner, and Joseph Bannister participated in the "Two City Rally" in Atlanta, GA on September 28, 2002, and in Oklahoma City in October 12, 2002. A fee of \$50.00 to \$60.00 per person was charged to attend the rally.

21.4 Sherry Peel Jackson, John Turner, and Joseph Bannister were the featured speakers at a WTP seminar in Arizona on October 19, 2003. No fee was charged to attend the rally, but donations were solicited.

21.5 Sherry Peel Jackson, John Turner, and Joseph Bannister were the featured speakers at the "First Annual Give Me Liberty National Conference" in Arlington, VA on January 21-24, 2004. WTP arranged the conference.

21.6 Sherry Peel Jackson was a featured speaker at a "Quest Live Seminar" in Atlanta, GA on May 15, 2004. Seminar topics included: Tax reduction, debt elimination and asset protection.

22. Sherry Peel Jackson has been identified as a business associate, and possible co-conspirator, in Larkin Rose's attempt to defraud the United States. The Philadelphia Field Office of IRS-CI initiated a grand jury criminal investigation for the alleged tax violations committed by Larkin Rose in February 2003. During the course of their criminal investigation, the IRS-CI Philadelphia special agents identified a box of videocassette tapes mailed from their subject, Larkin Rose, to Sherry Peel Jackson. The videocassettes are 88-minute videos entitled "Theft By Deception". The videocassettes present a comprehensive interpretation on the misrepresentation and misapplication of the United States Federal Income Tax. The videocassettes also promote the anti-tax movement. The videocassettes are both narrated and copyrighted by Larkin Rose.

23. Larkin Rose also utilizes a website entitled "Theft By Deception" (TBD) (www.theft-by-deception.com or www.theftbydeception.com) to promote his ideology and the selling of his similarly entitled video. In a section entitled "Testimonials" on the TBD website, the following quote is attributed to "Sherry Peel Jackson, CPA, former IRS Revenue Agent," "This tape (Theft-By-Deception) will show you clearly and without a doubt that most American citizens are not liable for the income tax'."

24. During the course of the grand jury criminal investigation by the Philadelphia Field Office IRS-CI, a search of discarded trash from Larkin Rose's home on January 28, 2003 revealed the following note, "Hi...4 Videos...Sherry". A second search of discarded trash at the same location on February 4, 2003 revealed an empty United States Postal Service

Priority Mail Envelope from Sherry Peel Jackson to Larkin Rose. Based on the above information, your affiant believes that Sherry Peel Jackson is performing an active marketing role in the distribution of the videotape, "Theft By Deception."

25. During the course of the grand jury criminal investigation by the Philadelphia Field Office IRS-CI, a search warrant was executed on Larkin Rose's home on May 6, 2003. IRS-CI special agents seized e-mail correspondence between Sherry Peel Jackson and Larkin Rose. The e-mail correspondence from Larkin Rose to Sherry Peel Jackson went to the following email address: spjcpa@mindspring.com The Philadelphia Field Office IRS-CI office provided your affiant with copies of the seized email correspondence. The following excerpts are quotes from the Sherry Peel Jackson/Larkin Rose email correspondence seized during the execution of the search warrant.

25.1 Nov. 9, 2001 - ".....To be blunt, I am going to wage a propaganda war, and part of it includes trying to inform IRS employees, and convince them to educate themselves, and then to "defect" from the massive misapplication of the law. At the moment I can't explain all the details of the campaign, but it will be big....." Larkin Rose larken@taxableincom.net

25.2 Apr. 13, 2002 -- "Hi Larkin, I have not heard from you in a while. What is going on with your project?.. There is a great need for that project to take off. Let me know if I can help further. SPJ" Sherry P Jackson

25.3 Apr. 13, 2002 – "...I definitely want to get a bunch of copies of the video (TBD) to you, to send to whomever you think would be the best targets....." Larkin Rose

25.4 Apr. 16, 2002 – "...Is everything set up? My address is 1560 Fieldgreen Overlook, Stone Mountain, Georgia 30088. I am having a meeting on May 18th and would like to order several videos to give to my group. Aside from what you were going to give me, how much are they selling for? SPJ" Sherry P Jackson

25.5 Apr. 24, 2002 – "The tape is superb!.....This tape is very powerful. I will purchasing as many as possible as funds permit. SPJ" Sherry P Jackson

26. Sherry Peel Jackson appeared as a "call in" guest to the Atlanta, GA "news talk" radio station WSB 750 AM on January 28, 2004 in reference to a discussion held by the host Clark Howard on the "Clark Howard Show" relative to income taxes. An audio recording of this live broadcast was obtained by your affiant shortly after Sherry Peel Jackson's radio appearance. Sherry Peel Jackson called into the show in response to Clark Howard's conversation with "call in" guest Joseph Bannister, who advocates not paying Federal Income Taxes. During the broadcast conversation, Sherry Peel Jackson stated, "...I have done a lot of research and have come to the same conclusion as Mr. Bannister has..." Sherry Peel Jackson went on to say, "the Federal Income Tax System is being misrepresented and misapplied to the American People." Clark Howard asked Sherry Peel Jackson, "Do you file and pay your own

income taxes?" to which she replied, "If I have taxable income, then I pay that. No, I have not filed an income tax return..."

27. Sherry Peel Jackson appeared as a "call in" guest to an Aurora, IL "talk" radio station WBIG 1280 AM on February 13, 2003, in conjunction with a special series called "Truth In Taxation Week." A Special Agent from the IRS-CI Chicago Field Office audio recorded her radio appearance and made a copy of the audio recording available to your affiant. Sherry Peel Jackson claims to have an eighteen (18) month plan "to eliminate" the IRS. When asked by the host how she came up with the her eighteen (18) month plan, she responded by reading "The Art of War" and "...getting correspondence from Larkin Rose concerning the way we communicate our position...". Sherry Peel Jackson goes on to explain that her plan is "very simple" and begins with advising "everyone in this country to get a copy of the Theft By Deception video from Larkin Rose, that's theftbydeception.com, that's his website. . .". Sherry Peel Jackson also stated "Larkin has, in my opinion, the 'Theft By Deception' video which is the best formulation of information on the income tax misapplication...the video tells why we don't owe and how we got tricked into thinking we owe..."

28. The following is a summary of Sherry Peel Jackson's 18-Month Plan to Eliminate the IRS. This plan of action was prepared by Sherry Peel Jackson December 11, 2002.

- **Rule # 1- Know What You Are Fighting For**

First understand the issue. The issue is the misapplication and misrepresentation of the income tax. Know the issue front and back, and know it well enough to explain it to others.

- **Rule # 2 – Know Your Enemy**

The Government (Internal Revenue Service, United States Prosecutors & Federal Judges).

- **Rule # 3 – Wage A Propaganda War (Become Good Spin Doctors)**

- Become “spin-doctors” and get this issue out the American people within the next 18 months so that the IRS will be eliminated. Educate the following people: Friends & Family Members, CPA's & Attorneys, Any College Campuses in your area, Public Access Television (Theft-By-Deception video), Post Office, Library & Community Centers (Use of Flyers), Tax Preparing Companies (i.e. H & R Block and smaller tax service offices)

III. PROBABLE CAUSE TO BELIEVE THAT EVIDENCE OF CRIMINAL ACTIVITY WILL BE FOUND ON THE PREMISE TO BE SEARCHED

29. Based upon your affiant's experience as a special agent, and discussions with senior agents and affiant's supervisor, your affiant believes it is a common practice for accountants who operate their business out of their home to maintain records for an extended period of time. A review of 1998, 1999, 2000, 2001, 2002, and 2003 tax returns prepared by Sherry Peel Jackson, CPA reflect the business address of Sherry P. Jackson, CPA, LLC as 1560 Fieldgreen Overlook, Stone Mountain, Georgia 30088. Your affiant believes that probable cause exists that records/documents, as set forth in Attachment A, representing evidence of violations of Title 26, United States Code § 7201, § 7203,

and § 7212(a) as well as Title 18, United States Code § 371 will be found at the Jacksons' residence. This belief is further supported by the information obtained from the searches of discarded trash from the Jacksons' residence performed on December 9, 2003, December 16, 2003 and December 22, 2003, from the county record inquiries performed December 30, 2003 and a United States Postal Service mail cover initiated in March of 2004.

30. The mail cover, performed substantially in March through April 2004, revealed mail addressed to Sherry Peel Jackson delivered to 1560 Fieldgreen Overlook, Stone Mountain, GA 30088 from the following:

- Financial Institutions including: Edward Jones, Georgia Federal Credit Union, Bank One
- Utility companies including: Dish Network, Bell South, T-Mobile, Dekalb County, Southern Company
- Association of Certified Fraud Examiners (ACFE)
- The CPA Letter
- AICPA
- Media By Pass

31. Searches of discarded trash on the days identified above revealed the following:

- Print out from the WTP website (www.givemeliberty.org) entitled "Employer Simkanin Prosecution End", dated November 26, 2003.
- Delta Airlines Boarding Pass in the name of Sherry Peel Jackson, Atlanta to Boston, dated November 15, 2003.
- Granite State Insurance Company notice of cancellation for nonpayment. Name insured: Sherry Peel Jackson, CPA, CFE 1560 Fieldgreen Overlook, Ste A, Stone Mountain, GA 30088.

- Wells Fargo Home Mortgage, Inc. monthly mortgage statement addressed to Colin L. Jackson for property address: "1560 Fieldgreen Over Stone Mountain GA 30088"
- Delta Airlines Boarding Pass in the name of Colin L. Jackson and Sherry Peel Jackson, Cancun, Mexico to Atlanta, dated December 13, 2003.
- Two (2) Email correspondences to Sherry Peel Jackson [spcpa@bellsouth.net] from Larken Rose, dated December 1, 2003.
- Print out from the WTP website (www.givemeliberty.org) Convention Agenda Give Me Liberty 2004, dated November 25, 2003.
- "Theft By Deception" Order Form
- Email correspondence from Sherry Peel Jackson [spjcpa@bellsouth.net] to Bob Schulz.
- "Pinnacle Quest Q2 International Conference Agenda", dated December 11, 2003.
- Flyer- "Breaking the Invisible Shackles"... Sherry Peel Jackson, CPA, CFE speaks out. 1.5 hour DVD.... \$40 Donation.
- Flyer- "ARE YOU INTERESTED IN LEARNNG ABOUT THE TRUE NATURE OF THE INCOME TAX? Please Join Sherry Peel Jackson Flyer", dated Saturday, September 27, 2003.
- Envelope from State of Georgia Office of School Readiness addressed to Cameron, Miles & Jackson, PC Auditors, 1560 Fieldgreen Overlook, Suite A, Stone Mountain, GA 30088.
- Edward Jones Monthly Statement. Names on account: Colin L. Jackson and Sherry Peel Jackson
- Business card in the name of Colin L. Jackson – Ambassador Recording Studio 1560 Fieldgreen Overlook, Stone Mountain, GA 30088.

32. A surveillance operation on Sherry Peel Jackson was performed by

Special Agents IRS-CI, Atlanta Field Office, on December 2, 2003. This surveillance provided no indication that Sherry Peel Jackson maintains, or travels to, an outside office. Colin L. Jackson and Sherry Peel Jackson are not known to have an office outside of their residence and there are no records indicating that either Colin L. Jackson or Sherry Peel Jackson utilizes an office outside of their residence.

33. Your affiant performed a telephone directory check on July 13, 2004 for Sherry Peel Jackson, CPA PC operating in and around Stone Mountain, GA utilizing www.bellsouth.com, a website operated by Bell South, the local telephone service provider. The search produced no business listings connected to Sherry Peel Jackson. Further, Colin L. Jackson and Sherry Peel Jackson's 1999 Form 1040 Schedule C listed their residential address, 1560 Fieldgreen Overlook, Stone Mountain, Georgia 30088, as the address of record for Sherry Peel Jackson's CPA business. On July 15, 2004, your affiant's inquiry at the DeKalb County Division of Internal Audit and Licensing revealed that Colin L. Jackson and Sherry Peel Jackson's 1560 Fieldgreen Overlook, Stone Mountain, GA address is also the physical business address for the following businesses: Sherry P. Jackson CPA (License Number 91420), Cameron Miles & Jackson PC (License Number 143885) and Ambassador Investments (License Number 143886). Based on the above information, your affiant has probable cause to believe that both Colin L. Jackson and Sherry Peel Jackson are operating income producing businesses from their residence located at 1560 Fieldgreen Overlook, Stone Mountain, GA 30088. As a result, your affiant has probable cause to believe that financial and other documents/records, as set forth in Attachment A, constituting evidence of violations of Title 26, United States Code § 7201, § 7203, and § 7212(a), as well as, Title 18, United States Code § 371 are present at 1560 Fieldgreen Overlook, Stone Mountain, GA 30088.

34. Based on your affiant's experience in conducting financial investigations and the information obtained during the course of the investigation, your affiant believes that there is probable cause to believe that there are one or more computers, and associated equipment will be found at 1560 Fieldgreen Overlook, Stone Mountain, GA 30088, the residence of Colin L. and Sherry Peel Jackson. Based on your affiant's experience as a Special Agent and based on your affiant's discussions with senior IRS-CI Special Agents and those trained in forensic computer analysis who have analyzed evidence from computers in prior investigations, searching computerized information for contraband or evidence or instrumentalities of crime commonly requires that a qualified computer expert accurately retrieve the system's data in a laboratory or other controlled environment. This is true because of the following:

34.1 The volume of evidence. Computer storage devices (such as RAM, hard disks, diskettes, tapes, laser disks, Bernoulli drives) can store the equivalent of thousands of pages of information. Additionally, a suspect may try to conceal criminal evidence; he might store it in random order with deceptive file names. This may require searching authorities to examine all the stored data to determine which particular files are evidence or instrumentalities of crime. This sorting process can take weeks or months, depending on the volume of data stored and it would be impractical to attempt this kind of data search on site.

34.2 Technical requirements. Searching computer systems for criminal evidence is a highly technical process requiring expert skill and a properly controlled environment. The vast array of computer hardware and software available requires even computer experts to specialize in some systems and applications, so it is difficult to

know before a search which expert is qualified to analyze the system and its data. In any event, however, data search protocols are exacting scientific procedures designed to protect the integrity of the evidence and to recover even "hidden," erased, compressed, password protected, or encrypted files. Because computer evidence is extremely vulnerable to inadvertent or intentional modification or destruction (both from external sources or from destructive code embedded in the system as a "booby trap"), a controlled environment is essential to its complete and accurate analysis. In addition, information and data stored in an electronic format may be "encrypted" which means it is unreadable absent use of a password or key to "decrypt" the information. Also, specialized equipment, which cannot be transported easily to every search site, may be required in order to review information stored in an electronic format on certain computer equipment or computer peripherals.

Agents will make every attempt to mirror image computers on site of the search location. If not possible, computers will be taken offsite for analysis and returned as expeditiously as possible.

35. Based on your affiant's experience and discussions with forensic computer analysts, your affiant understands that the analysis of electronically stored data, whether performed on-site or in a laboratory or other controlled environment, may entail any or all of several different techniques. Such techniques may include surveying various file "directories" and the individual files they contain (analogous to looking at the outside of a file cabinet for the pertinent files and at file titles, in order to locate the evidence and instrumentalities authorized for seizure by the warrant); "opening" or reading the first few "pages" of such files in order

to determine their precise contents; "scanning" storage areas to discover and possibly recover recently deleted data; scanning storage areas for deliberately hidden files; or performing electronic "keyword" searches through all electronic storage areas to determine whether occurrences of language contained in such storage areas exist that are intimately related to the subject matter of the investigation. Your affiant anticipates these techniques may be employed in this case.

36. Based on your affiant's experience and discussions with forensic computer analysts your affiant understands that it is often useful to have the peripheral equipment that the subject has used with the seized computer in order to assist in properly searching that computer. Also, your affiant understands that it is often useful to have the instructions, manuals, operating instructions, and other literature for the computers or storage devices in order to assist in the search of those computers and devices. These documents are usually received by the purchaser of the device and maintained by the purchaser with the device.

37. If, after inspection of any seized computer equipment, the computer analysts determine that the items are no longer necessary to retrieve and preserve the data evidence, the Government will return same items within a reasonable time.

IV. CONCLUSION

38. Based on the information detailed in this affidavit and your affiant's experience, your affiant believes that there is probable cause to believe a search of the residence of Colin L. Jackson and Sherry Peel Jackson at 1560 Fieldgreen Overlook, Stone Mountain, GA 30088 will locate evidence of violations of Title 26, United States Code, § 7201, § 7203, and § 7212. Furthermore, there is probable cause to believe that Sherry

Peel Jackson has conspired with one or more individuals to attempt to defraud the United States by impeding, impairing, obstructing and defeating the ascertainment, calculation, assessment and collection of the federal income taxes in violation of Title 18, United States Code, § 371.

39. Based on the information detailed in this affidavit and your affiant's experience, your affiant believes it is necessary to conduct a search warrant to prevent the destruction and relocation of evidentiary records and to obtain information documents/records as set forth in Attachment A, incorporated herein by reference, which would not otherwise be provided by Colin L. Jackson and Sherry Peel Jackson during the normal course of the investigation. It is your affiant's belief that an attempt to obtain necessary and relevant information, documents/records to substantiate criminal violations by any other means will result in relocation and/or destruction of that evidence.