

## **Rainier View Water Company**

### *Court Cases*

***Valley Finance, Inc., et al., Appellants v. United States of America, et al.***

***(CA-DC), U.S. Court of Appeals, D. of C. Circuit, No. 78-1585, 79-1151, 79-1301, 629 F2d 162, 7/14/80***

Tongsun Park was a shareholder of Pacific Development, Inc., had a large unpaid tax liability to the Internal Revenue Service. The IRS seized the assets of Pacific Development, Inc. to pay Park's tax liability. The District and Appellate courts ruled that the IRS was justified in seizing the assets because Pacific Development,

***U.S. District Court, So. Dist. N.Y., United States of America, Plaintiff v. Roy M. Cohn, et al.***

***U.S. District Court, So. Dist. NY., 86 Civ. 2700 (CSH), 3/25/88, 682 Fsupp 209***

Roy M. Cohn had a \$7,000,000 unpaid tax liability to the Internal Revenue Service. The IRS contended that the taxpayer transferred assets to avoid tax liability. The IRS sought to seize this property, along with wages retained by Mr. Cohn's employer to pay personal expenses, to pay the tax liability. The issues of "alter ego" and "nominee" ownership interests were discussed.

***Century Hotels, Crismar Corporation v. United States of America***

***(CA-5), U.S. Court of Appeals, 5th Circuit, 90-3732, 1/30/92, 952 F2d 107***

The IRS seized property of a corporation that was the "alter ego" of a taxpayer for the taxpayer's unpaid taxes, and thereafter the corporation filed for Chapter 11 bankruptcy protection.