

DEPARTMENT OF THE TREASURY ALCOHOL AND TOBACCO TAX AND TRADE BUREAU ABSTRACT AND STATEMENT		NOT IN SUIT
For briefing offers in compromise of liabilities and/or violations incurred under Chapters 32,51,52,53,68, and/or 78 of the Internal Revenue Code, and/or liabilities and/or violations incurred under the Federal Alcohol Administration Act.		
1. OFFER SUBMITTED BY (Name and address) Matthews Estate LLC 16116 140th Place NE Woodinville, Washington 98072	OFFER IN COMPROMISE	
	2. ORIGINATING OFFICE TID	3. AMOUNT OF OFFER \$36,500
	4. PERMIT, LICENSE, OR REGISTRY NO. (if applicable) [REDACTED]	5. SYSTEM CONTROL NUMBER(S) [REDACTED]
	6. DOLLAR AMOUNT OF LIABILITY BEING COMPROMISED (if applicable) \$ 130,813.27	
	7. TAXPAYER IDENTIFICATION NUMBER [REDACTED]	
8. CHARGE VIOLATIONS:  Commencing in or about May 2002 and continuing through 2008: TTB alleges that Matthews Estate LLC failed to obtain an FAA Act basic permit to engage in the business of producing or blending wine in violation of 27 U.S.C. 203 and 27 C.F.R. 1.21; failed to establish wine premises operations, file bond, and receive permission to operate a wine premises prior to commencing bonded winery operations as a bonded winery in violation of 26 U.S.C. 5351 and 27 C.F.R. 24.100, 24.101, and 24.106; commenced operations without having a valid approved application for operations on file with TTB in violation of 26 U.S.C. 5153 and 5356 and 27 C.F.R. 24.105; commenced operations as a bonded winery without first filing and obtaining approval of a bond or consent of surety in violation of 26 U.S.C. 5355 and 5551 and 27 C.F.R. 24.145; failed to immediately pay federal excise tax on wine produced otherwise that is authorized by law in violation of 26 U.S.C. 5043(a)(3) and 27 C.F.R. 24.271; and unlawfully possessed property used or intended for use in violation of the Internal Revenue Code in violation of 26 U.S.C. 7302.  BUSINESS IN WHICH ENGAGED: The proponent was operating a business as a bonded wine cellar without a basic permit or bond.  DATE OR PERIOD AND LOCATION OF VIOLATIONS: On or about and between May 2002, and continuing through 2008, in the State of Washington.  AMOUNT AND TERMS OF OFFER: The proponent has submitted an offer of \$36,500.00 in compromise of the alleged violations incurred under the Internal Revenue Code and the Federal Alcohol Administration Act.  RECOMMENDATIONS: The Director, National Revenue Center recommends acceptance of the offer. In view of potential litigation hazards, acceptance of this Offer in Compromise, as submitted, is warranted.		
9. I have considered the proposition to compromise the liability as charged herein, and, for the reasons embodied in the above abstract and statement, am of the opinion that it will be for the best interest of the United States to <input checked="" type="checkbox"/> ACCEPT <input type="checkbox"/> REJECT the terms proposed. [REDACTED] Deputy Assistant Administrator		
10. SIGNATURE AND TITLE [REDACTED] Field Operations	11. DATE 7/31/09	