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| om 668(C)(AC | | 호텔에 보고 있는 경찰 연극하였다. | nt of the Treasury - In | | |
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| FEB. 1983) | Notic | e of Federal Ta | ax Lien Un | der Intern | al Revenue Laws |
| 3 | | Serial Number | | | For Optional Use by Recording Office |
| istrict CHICAGO | 7.0(2) | | | | |
| notice is give assessed agai this liability ha in favor of the to this taxpay | en that taxes inst the follow as been made, | 1, 6322, and 332 of the (including inter st an ing-named taxpay (*) but it remains unper on all property and rich ount of these taxes, a accrue. | remand for pay Therefore, there | ment of is a lien elonging enalties, | 27 527 480 |
| me of Taxpayer | JAMES E | & DASIE B GREEN | | | taking a sample |
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| notice of lien is a such date, oper | | ION: With respect to each as given in column (e), this no e of release as defined in li | | Last Day for Refiling | Jr aid Balance case base of Assessment |
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| | (or Registrar) | | day | 1/339 | i Tokpayer A SIZAC : I ZBAS E |

Excerpts From Internal Revenue Code

Sec. 6321. Lien For Taxes.

OUC. UOZ I. LICH FUI T I AXUS.

If any person hide to pay any tax neglects or refuses to pay the same after demand, the amount including any interest, additional amount, addition to tax, or assessable penalty, together with any costs that may accrue in addition thereto) shall—be a lien in fayor-of the United States—upon—all property and rights to property; whether real or personal, belonging to such person.

Sec. 6322. Period of Lien.

Indees, enother data is specifically fixed by tew, the lien imposed by seldine 0821 shall arise at the time the assessing it is imade and shall continue until the liability for the amount so assessed (or a judgment against the tarpayer arising out of such liability) is catisfied or becomes unenforceable by reason of lapse of time.

Sec. 6323 Validity and Priority Against Certain Persons. (e) Purchaser's, Holders Of Security In-

(a) Purchaser's, Holders Of Security Interests, TMechanic's Lienors, And Judgment Lien Creditors. — The lien imposed by section 6221 shall not be falled as against any purchasat, holder of security interest; mechanic's liener, or judgment lien creditor unaverbase thereof which meets the requirements of subsection of authority of the been filled by the Secretary.

(b) Protection For Certain Interests Even Though Notice Filled. — Fave though notice of a lien.

Though Notice Filed. — Even though notice of a lien imposed by section 6321 has been filed, such lien shall not be valid-

(f) Place For Filing Notice; Form.

(f) Place For Filling, — The notice referred to in sub-cition (a) shall be filed—

tion (s) shall be filed—

(A) Under State Laws.—

(i) Real Property.— In the case of real property, in one office within the State (or the county, or other governmental subdivision), as designated by the laws of such State, in which the property subject to the lien is situated; and

lien is situated; and Γ_{OO} (ii). Personal Property. — In the case of personal property, whether tangible or intangible, in one office within the State (or the county, or other governmental subdivision), as designated by the laws of such State, in which the property subject to the lien is situated:

or (B) With Clerk Of District Court. — In the office of the clerk of the United States district court for the judicial district in which the property subject to lien is situated.

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(A) Real Property is the case of real propert is physical location; or

(a). - Real-Property. — In the case of personal physical location; or .

(b) Personal Property. — In the case of personal property, whether tangible or intengible, at the residence of the taxpaper at the time the notice of line is filed. — For purposes or paragraph (2)–(8), the residence of a composition or partnessing ball be deemed to be interplace at which the principal executive office of jhe, business is incasted, and the residence of at taxpayer whose residence is without the United States shall be deemed to be in the District of Columbia.

(3) Form. — The form and content of the notice referred to in subsection (a) shall be prescribed by the Secretary, Soth notice shall be valid notwithstanding any other provision of law regarding the form or content of a notice of lien.

(g) Refiling Of Notice. — For purposes of this

section;

(1) Seneral Rule. — Unless notice of lien is reflied in the manner prescribed in paragraph (2) during the required fishling period, such notice of lien shall, be treated as filled on the date on which it is filled (in accordance with subsection (1)) state the expiration of such refling period.

(2) Place For Filling. — A notice of lien reflied during the required refling period shall be effective only—

(3) Required Refiling Period. — In the case of any notice of lief. the term required refiling period

(A) the one-year pecied ending 30 days after the expiration of 5 years after the date of the assessment of the tax, and 30 moneyer period ending with the expiration of 5 years after the close of the preceding required refiling period for such notice of lien.

Sec. 6325. Release Of Lien Or Discharge Of Property.

R lease Of Lieh. — Subject to such regulations as a ceretary any prescribe, the Secretary may issue a cereate of lease any lien imposed with respect to any

(1) Liability attained or Unanforceable. — The Secretary finds that the liability for an amount assessed, together with all interest in respect he of has been fully satisfied or has become legally unenforce. Mo or (2) Bond Accepted. — The cis furnished to the Secretary and accepted by him a bond it it is conditioned upon the payment of the amount, asset of mather with all interest in respect thereof, within, use it or promised by law (including any extension of such tie), it has is in accordance with such requirements relating users, conditions, and form of the bond and sureties there, a man be specified by such requirements.

Sec. 6103. Confidentiality and its closure of Returns and Return in

(k) Disclosure of Certain Returns and Return Information For Tax Administration Purposes. —

Heturn Information for land and internating lien. — If a notice of lien has been filed quissant to section 6323(f), the amount of the outside displayant to section 6323(f), the amount of the outside lien obligation secured by such lien may be disclosed to land characteristic part of the major be disclosed to land characteristic lien with the property subject to such lien or intends to obtain a right in such property.

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