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Form 688(Y)

Department of the Treasury - Internal Revenue Service

# Notice of Federal Tax Lien Under Internal Revenue Laws

<b>Belated</b> Chicago, IL	<b>Serial Number</b> CC 768511351	<b>For Payment Use by Recording Office</b>
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As provided by sections 6321, 6322, and 6323 of the Internal Revenue Code, notice is given that taxes (including interest and penalties) have been assessed against the following named taxpayer. Demand for payment of this liability has been made, but it remains unpaid. Therefore, there is a lien in favor of the United States on all property and rights to property belonging to this taxpayer for the amount of these taxes, and additional penalties, interest, and costs that may accrue.

Name of Taxpayer **El Taco Loco Incorporated, a Corporation**

Residence **1018 Central  
Evanston, IL 60201**

**IMPORTANT RELEASE INFORMATION:** With respect to each assessment listed below, unless notice of lien is refiled by the date given in color in this notice shall, on the day following such date, operate as a certificate of release as defined in IRC 6325(a).

Kind of Tax (a)	Tax Period Ended (b)	Identifying Number (c)	Date of Assessment (d)	Last Day for Paying (e)	Unpaid Balance of Assessment (f)
940	12-31-83	[REDACTED]	10-00-84	11-07-99	2788.03
941	12-31-83	[REDACTED]	9-22-84	10-24-90	5099.21

**Place of Filing**  
Recorder of Deeds  
Cook County  
Chicago, IL 60602

This notice was prepared and signed at **Chicago, IL**

the **7th** day of **October**, 19 **85**

Signature *Chester Baer*  
for **Chester Baer**  
**36-01-1653**

Title **Revenue Officer**  
**825#2111**

Notice of Lien Under Internal Revenue Laws

Notice of Lien

Section 6321 and 6322 of the Internal Revenue Code provide that in the case of a delinquent taxpayer, the Secretary may file a notice of lien in favor of the United States for the amount of any unpaid tax, interest, and penalties, together with any costs that may accrue in addition thereto, against all property and rights to property belonging to such taxpayer.

Excerpts From Internal Revenue Code

Sec. 6321. Lien For Taxes.

If any person liable 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 favor of the United States for the amount of such tax.

Sec. 6322. Period of Lien.

Unless otherwise specifically provided by law, the lien imposed by section 6321 shall continue in force until the liability for the amount so assessed (or a judgment against the taxpayer arising out of such liability) is satisfied or becomes unenforceable by reason of lapse of time.

Sec. 6323. Validity and Priority Against Certain Persons.

(a) Purchaser, Holder of Security Interest, Bankrupt's Lienor, and Judgment Lien Creditors. - The lien imposed by section 6321 shall not be valid against any purchaser, holder of a security interest, lien creditor's lien, or judgment lien creditor until notice in writing is filed with the appropriate State or local official.

(b) Place For Filing Notice; Form.

(1) Place For Filing. - The notice referred to in section 6321 shall be filed - (A) Under State Laws

(i) Real Property. - In the case of real property, in the office of the State or local government official (such as the State or local tax assessor or collector) in charge of the tax for such State, or (ii) Under Federal Law. - In the case of personal property, tangible or intangible, in any office within the State for the county, or other governmental subdivision, as designated by the State or local official.

(2) Office of District Court. - In the office of the clerk of the United States District Court for the district in which the property of such taxpayer is situated, whenever the State has not provided one or more offices which meet the requirements of subsection (1), or

(3) With Recorder of Deeds of The District of Columbia. - In the office of the Recorder of Deeds of the District of Columbia, if the property subject to the tax is situated in the District of Columbia.

(2) Form of Notice; Return to Lien. - For purposes of paragraphs (1) and (4), property shall be deemed to be situated - (A) Real Property. - In the case of real property at its physical location, or

(B) Personal Property. - In the case of personal property, whether tangible or intangible, at the residence of the taxpayer at the time the notice of lien is filed.

(3) Refiling of Notice. - If the notice of lien is not filed in the office of the person to whom it is required to be filed, the notice shall be deemed to be filed in the office of the person to whom it is required to be filed.

(4) Refiling of Notice. - If the notice of lien is not filed in the office of the person to whom it is required to be filed, the notice shall be deemed to be filed in the office of the person to whom it is required to be filed.

Note: See section 6323(b) for exceptions to a valid notice of lien imposed by section 6321 with respect to:

- 1. Securities
2. Motor vehicles
3. Personal property purchased at retail
4. Personal property purchased at public sale
5. Personal property subjected to possessory lien
6. Real property tax and special assessment liens
7. Residential property subject to a mechanic's lien for certain repairs and improvements
8. Attorney's liens
9. Certain insurance contracts
10. Federal loans

(5) Mailing Of Notice. - For purposes of this section -

(A) General Rule. - Unless notice of lien is received in the manner prescribed in paragraph (2) during the required waiting period, such notice of lien shall be treated as filed on the date on which it is mailed in accordance with subsection (5) after the expiration of such waiting period.

(B) Place For Filing. - A notice of lien referred to in subsection (1) shall be effective only -

- (A) if (i) such notice of lien is filed in the office of which the prior notice of lien was filed, and (ii) in the case of real property, the fact of mailing is entered and recorded in an index in the manner required by subsection (1) (4); and (B) in any case in which, 30 days or more prior to the date of a mailing of notice of lien under subsection (5), the

Secretary, upon application by the taxpayer, may, in his discretion, suspend the operation of this section in the case of any taxpayer who is unable to pay the amount of such tax, interest, and penalties, if such taxpayer is unable to pay such tax, interest, and penalties in accordance with subsection (1) of this section.

Annual Refiling Period.

(1) The one-year period ending 30 days after the expiration of 6 years after the date of the assessment of the tax, and (2) the one-year period ending with the expiration of 6 years after the date of the expiration of the period of such notice of lien.

Sec. 6325. Release Of Lien Or Discharge Of Property

(a) Release Of Lien. - Subject to section 6323, the Secretary may, in his discretion, release the lien imposed by section 6321 in whole or in part if the taxpayer is unable to pay the amount of such tax, interest, and penalties, if such taxpayer is unable to pay such tax, interest, and penalties in accordance with subsection (1) of this section.

(1) Liability Satisfied or Unenforceable. - The Secretary may, in his discretion, release the lien imposed by section 6321 in whole or in part if the taxpayer is unable to pay the amount of such tax, interest, and penalties, if such taxpayer is unable to pay such tax, interest, and penalties in accordance with subsection (1) of this section.

Sec. 6326. Confidentiality and Disclosure of Returns and Return Information.

(a) Return of Certain Returns and Return Information For Tax Administration Purposes. -

(2) Disclosure of Amount of Outstanding Lien. - If a notice of lien has been filed pursuant to section 6321, the amount of the outstanding obligation secured by such lien may be disclosed to any person who has a right in the property subject to such lien or who is obtaining a right in such property.

Revenue Officer 0524511

FILED FOR RECORD OCT 22 AM 9 15

COOK COUNTY, ILLINOIS