

UNOFFICIAL COPY

86244515

6-12

Form 688(Y)

Department of the Treasury - Internal Revenue Service

Rev. 4-27-1985

Notice of Federal Tax Lien Under Internal Revenue Laws

District	Serial Number	For Optional Use By Recording Office
Chicago, IL	368605437	

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 Hyatt Johnson & Mary Johnson

Residence 400 East 41st Street
Chicago, IL 60653

IMPORTANT RELEASE INFORMATION: With respect to each assessment listed below, unless notice of lien is filed by the date given in column (e), 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 Filing (e)	Unpaid Balance of Assessment (f)
1040	12-31-80	[REDACTED]	10-29-84	11-28-90	8649.79
1040	12-31-82	[REDACTED]	9-23-85	10-23-91	1979.55

Place of Filing	Total \$
Recorder of Deeds Cook County Chicago, IL 60602	\$ 10629.34

This notice was prepared and signed at Chicago, IL, on this.

the 4th day of June, 1986.

Signature

for J. Scott

Title

Revenue Officer

NOTE: Certificate of officer's authority to file tax acknowledgments is not essential to the validity of Notice of Federal Tax Lien.
Rev. Rul. 71-466, 1971-2 C.B. 469

Part I - Kept By Recording Office

Form 688(Y) Rev. 4-27-1985

86244515

UNOFFICIAL COPY

(Form 6321) Rev. 6-68

No.
United States

Notice of Tax Lien

Clerk for Registration

Filed this _____ day of _____, 19____.

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 upon all property and rights to property, whether real or personal, belonging to such person.

Sec. 6322. Period Of Lien.

Unless another date is specifically fixed by law, the period imposed by section 6321 shall arise at the time the assessment is made and shall continue until the liability for the amount so assessed for 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.

Any Purchaser's, Holders Of Security Interests, Mechanic's Liens, And Judgment Lien Creditors. — The lien imposed by section 6321 shall not prevail as against any purchaser, holder of a security interest, mechanic's lien, or judgment lien creditor (and notice thereof which meets the requirements of subsection (1) has been filed by the Secretary).

In «Place For Filing Notice; Form.»

(1) **Place For Filing.** — The place referred to in subsection (1) shall be filed.

(2) **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

(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;

(iii) **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 the lien is situated, whenever the State has not by law designated one office which meets the requirements of subparagraph (A); or

(iv) **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 lien is situated in the District of Columbia.

(2) **Status Of Property Subject 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.

For purposes of paragraph (3)(b), the residence of a corporation or partnership shall be deemed to be the place at which the principal executive offices of the business is located, and the residence of a 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 (1) shall be prescribed by the Secretary. Such notice shall be valid notwithstanding any other provision of the regulations, the form or content of a notice of lien.

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 in consignment
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. Passbook loans

(b) Refiling Of Notice. — For purposes of this section

(1) **General Rule.** — Unless notice of lien is refiled in the manner prescribed in paragraph (2) during the required refiling period, such notice of lien shall be treated as filed on the date on which it is filed in accordance with subsection (1) after the expiration of such refiling period.

(2) **Place For Filing.** — A notice of lien refiled during the required refiling period shall be effective only:

(A) if

(i) such notice of lien is refiled in the office in which the prior notice of lien was filed; and

(ii) in the case of real property, the fact of refiling is entered and recorded in an index to the extent required by subsection (1)(4); and

(B) in any case in which 90 days or more prior to the date of a refiling of notice of lien under subparagraph (A), the

Secretary receives written information on the plan or plans prescribed in regulations issued by the Secretary concerning a change in the taxpayer's residence, if notice of such change is also filed in accordance with subsection (1) of the State in which such residence is located.

(3) **Required Refiling Period.** — In the case of any notice of lien, the term required refiling period means:

- (A) the one year period ending 30 days after the date of filing of 6 years after the date of the assessment of the tax; and
- (B) the one year period ending with the expiration of 6 years after the close of the preceding income tax filing period for such notice of lien.

Sec. 6325. Release Of Lien Or Discharge Of Property

(1) **Release Of Lien.** — In the manner and such regulations as the Secretary may prescribe, the Secretary shall issue a certificate of release of any lien imposed in respect to any internal revenue tax not later than 30 days after the day on which:

(A) **Liability Satisfied or Unenforceable.** — The Secretary finds that the liability for the amount assessed to the unpaid interest in respect thereof has been fully satisfied or has become legally unenforceable; or

(B) **Bond Accepted.** — There is furnished to the Secretary and accepted by him a bond that is conditioned upon the payment of the amount assessed together with interest thereon, except thereof, within the time prescribed by law, including any extension of such time, and that is executed in writing with such requirements, as to terms and conditions, as to form of the bond and sureties thereon, as may be specified by such regulations.

Sec. 6103. Confidentiality And Disclosure of Returns and Return Information.

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

(2) Disclosure of amount of outstanding tax if a notice of lien has been filed pursuant to section 6321, the amount of the outstanding obligation secured by such notice be disclosed to any person who furnishes satisfactory written evidence that he has a right in the property subject to such lien or intends to obtain a right in such property.

COOK COUNTY, ILLINOIS
FILED FOR RECORD

1986 JUN 17 AM 9:12

86244845