

UNOFFICIAL COPY

Form 689(Y)

Department of the Treasury - Internal Revenue Service

(Rev. May 1985)

Notice of Federal Tax Lien Under Internal Revenue Laws

District Chicago, IL Serial Number 368606495 For Optional Use by Recording Office

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 William O'Connell, 180% Penalty
Residence 2452 Emerald Court Apt 12-104 Woodridge, IL 60517

FILED 0028 86288004

IMPORTANT RELEASE INFORMATION: With respect to each assessment listed below, unless notice of lien is refilled 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).

Table with 6 columns: Kind of Tax, Tax Period Ended, Identifying Number, Date of Assessment, Last Day for Refiling, Unpaid Balance of Assessment. Row 1: 941, 3-31-85, 354-38-8938N, 4-21-86, 5-21-92, 12109.51

Place of Filing Recorder of Deeds Cook County Chicago, IL 60602 Total \$ 12109.51

This notice was prepared and signed at Chicago, IL

the 27th day of June, 1986

Signature [Signature] for L. Shovar 36-01-3202 Title Revenue Officer

Form 688 (Y)

FILED \$6.00

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Property of William O'Connell

Department of the Treasury - Internal Revenue Service

Notice of Federal Tax Lien Under Internal Revenue Laws

As provided by sections 6321, 6322, and 6323 of the Internal Revenue Code... Notice of Federal Tax Lien

Name of Taxpayer: William O'Connell, Jr. Penalty

Residence: 3425 Emerald Court Apt 12-104 Woodbridge, IL 60517

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 lien 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.

(a) Purchaser's, Holders Of Security Interests, Mortgage Lenders, And Judgment Lien Creditors. - The lien imposed by section 6321 shall not be valid against any purchaser, holder of a security interest, mortgage lender, or judgment lien creditor until notice thereof which meets the requirements of subsection (f) has been filed by the Secretary.

(c) Places For Filing Notice; Form. -

(1) Place For Filing. - The notice referred to in subsection (a) 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
(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.
(B) With Clerk Of District Court. - In the office of the clerk of the United States district court in 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
(C) 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) Situs Of Property Subject To Lien. - For purposes of paragraphs (1) and (c) 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) Place For Filing. - The place at which the notice referred to in subsection (a) shall be filed shall be the residence of the taxpayer whose residence is within the United States shall be deemed to be in the District of Columbia.

(4) Form. - The form and content of the notice referred to in subsection (a) shall be prescribed by the Secretary. Such notice shall be valid notwithstanding any other provision of law regarding 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 casual 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. Passbook loans

(g) 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 (f) 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 filed 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 (f) (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 issued, under information in the manner prescribed in regulations issued by the Secretary, a notice of change in the taxpayer's residence, if a notice of such lien is also filed in accordance with subsection (f) in the State in which such residence is located.

(h) Required Refiling Period. -

(1) 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 close of the preceding required refiling period for such notice of lien.

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

(a) Release Of Lien. - Subject to such regulations as the Secretary may prescribe, the Secretary shall issue a certificate of release of any lien imposed with respect to any internal revenue tax not later than 30 days after the day on which -

- (1) Liability Satisfied or Unenforceable. - The Secretary finds that the liability for the amount assessed, together with all interest in respect thereof, has been fully satisfied or has become legally unenforceable, or
(2) 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 all interest in respect thereof, within the time prescribed by law (including any extension of such time), and that is in accordance with such requirements, terms, conditions, and form of the bond and sureties as may be specified by such regulations.

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

(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 through appropriate written procedures has a right in the property subject to such lien or intends to obtain a right in such property.

Revenue Officer

FOR J. PROVAC 36-10-1205