

# UNOFFICIAL COPY

Department of the Treasury - Internal Revenue Service

Form 668(C)(ACS)

FEB 1983

## Notice of Federal Tax Lien Under Internal Revenue Laws

District:

Serial Number:

For Optional Use: *For Use by the Office*

CHICAGO

FILED  
00.02

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:

QUALITY GENERAL CONSTRUCTION INC  
"A CORPORATION"

Residence:

327 N BELL  
CHICAGO, IL 60612-2203

86299129

IMPORTANT RELEASE INFORMATION: With respect to each assessment listed below, unless notice of lien is refiled by the date given in column 5, this notice shall, on the day following such date, operate as a certificate of release as defined in IRC 6325 (a).

Kind of Tax	Tax Period Ended	Identifying Number	Date of Assessment	Last Day for Refiling	Unpaid Balance of Assessment
941	12-31-85	[REDACTED]	03-17-86	04-16-92	43, [REDACTED]

Place of Filing:

Recorder Of Deeds  
Cook County  
Chicago, Illinois

Total \$

43,509.15

60612

86299129

This notice was prepared and signed at

KANSAS CITY, MISSOURI

on this

the 27TH day of JUNE 19 86

Signature:

Title:

*Dorothy O. Smith*

COLLECTION BRANCH

NOTE: Certificate of office authorized by 26 USC 6322(b)(2)(B) and 6323(b)(2)(B) in lieu of notice of Federal Tax Lien. Rev. Rul. 77-456 (1977-2, CB 405).

Part 1-To Be Kept By the Filing Office.

FILED \$8.00

APR 12 1961

No.

United States

VS.

Notice of Tax Lien

19 at m. day of

Clerk (or Registrar).

Property of Cook County Clerk's Office

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... together with any costs that may accrue in addition thereon 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 the law imposed by section 6321, the date of the time the assessment is made and shall continue until the ability to pay the amount so assessed is a judgment against the tax payer arising out of such liability is satisfied or becomes unenforceable by reason of lapse of time.

Sec. 6323. Validity and Priority Against Certain Persons

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

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

(a) Place 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 the 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 the 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 Dist. Of 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 the office

which creates the lien, namely, the office of the Clerk of the District Court of the District of Columbia in the case of the American Overseas Bank of the District of Columbia if the property subject to the lien is situated in the District of Columbia.

(2) State of Residence. - In the case of personal property, the office in the State in which the property is situated shall be the office in which the notice is filed.

(3) Form. - The form and content of the notice referred to in subsection (a) shall be prescribed by the Secretary and shall be in accordance with the other provisions of law regarding the form of notices of a lien of this kind.

(b) Refiling Of Notice. - For purposes of this section, a notice of a lien referred to in subsection (a) shall be deemed to be the notice of a lien if the period prescribed in paragraph (1) for filing the notice has expired and the notice is refiled in accordance with subsection (a) after the expiration of such refile period.

(c) General Rule. - Unless another date is fixed in the manner prescribed in paragraph (1) for filing the notice, the required refile period shall be effective only during the required refile period.

(d) Place For Filing. - A notice of a lien filed during the required refile period shall be effective only if it is filed in the office in which the lien notice of a lien was filed and (2) in the case of real property, the office of filing is determined and determined in accordance with the requirements prescribed by subsection (a) (1) (A) and (B) in the case in which (i) the State in which the date of a refile notice of a lien under subsection (a) (1) (A) the Secretary received written information in the manner prescribed in regulations issued by the Secretary concerning a change in the taxpayer's residence, or (ii) a notice of such lien is also filed in accordance with subsection (a) in the State in which such residence is located.

(2) Required Refiling Period. - In the case of any notice of a lien, the term "required refile period" means:

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

Sec. 6325. Release Of Lien Or Discharge Of Property

Release Of Lien. - Subject to such regulations as the Secretary may prescribe, the Secretary may issue a certificate of release of a lien imposed with respect to any internal revenue tax if:

(1) the amount so assessed is paid to the Secretary and accepted by him as being that amount assessed together with all interest assessed thereon within the time prescribed by law including any extension of such time, and that it is in accordance with such requirements relating to taxes, compliance, and terms of the bond and security interest as may be required by the regulations;

(2) the amount so assessed is paid to the Secretary and accepted by him as being that amount assessed together with all interest assessed thereon within the time prescribed by law including any extension of such time, and that it is in accordance with such requirements relating to taxes, compliance, and terms of the bond and security interest as may be required by the regulations;

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

Disclosure of Certain Returns and Return Information For Tax Administration Purposes. -

(1) Disclosure of amount of outstanding tax. - If a notice of a lien has been filed pursuant to section 6321, the amount of the outstanding obligation created by such lien may 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.

32166798

60