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Form 888(C)(ACS)

(FEB. 1983)

Department of the Treasury, Internal Revenue Service

Notice of Federal Tax Lien Under Internal Revenue Laws

District	Serial Number	For Optional Use by Recording Office
CHICAGO	86336326	

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
SALAH S. SMITH

Residence
8114 S. RANDON AVE.
CHICAGO, IL 60617

IMPORTANT RELEASE INFORMATION: With respect to each assessment listed below, unless notice of lien is refiled 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	Tax Period Ended	Identifying Number	Date of Assessment	Last Day for Refiling	Unpaid Balance of Assessment
1040	12-31-85	[REDACTED]	10-07-85	11-06-91	1,720.96
1040	12-31-84	[REDACTED]	10-11-85	11-13-91	2,564.52
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Place of Filing (check if not entered on another page)

Recorder of Deeds
Cook County
Chicago, Illinois

Total \$ 4,285.48

60617

KANSAS CITY, MISSOURI

This notice was prepared and signed at

, on this,

the 11TH day of JULY 19

Signature

Dorothy D Smith

Title

COLLECTION BRANCH

(NOTE: Certificate of officer authorized by law to take acknowledgments is not essential to the validity of Notice of Federal Tax Lien. Rev. Rul. 71-466, 1971-2, C.B. 409)

Part 1-To Be Kept By Recording Office

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Clerk (or Registrar)

Filed this

day of

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.

(C) **Situs Of Property Subject To Lien.** — For purposes of subparagraph (A) and (C) property shall be deemed to be situated:

(1) **Real Property.** — In the case of real property, at its place of location;

(2) **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 paragraphs (2) and (B), the residence of a corporation or partnership shall be deemed to be the place at which the principal place of business 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) **Firm.** — The name and address of the office 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.

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 late, late, additional amount, addition to tax or assessable penalty together with any costs that may accrue in action therefore, shall be a lien in favor of the United States upon all property and rights to property whatever now or personal, belonging to such persons:

Sec. 6322. Period of Lien.

Unless otherwise provided 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 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.

(a) **Purchaser's, Holders Of Security Interests, Mechanic's Liens, And Judgment Lien Creditors.** — The lien imposed by section 6321 shall not be valid as against any purchaser in good faith, security interest, mechanic's lien or judgment lien creditor who notice thereof which meets the requirements of subsection (f) has been filed by the Secretary.

(b) **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:

(i) Place For Filing Notice; Form.

(1) **Place for filing.** — The notice referred to in subsection (a) shall be filed:

(A) Under State Law:

(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, 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 whenever the State has not by law designated one office

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

(1) **General Rule.** — Unless notice of lien is filed 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 filed during the required refiling period shall be effective only:

(i) if

(ii) such notice of lien is filed in the office in which the prior notice of lien was filed and

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

(iv) 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 received written information in the manner prescribed in regulations issued by the Secretary concerning a 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

(iii) **Required Refiling Period.** — In the case of any notice of lien, the term "refiling" means either:

(A) the one year period ending 30 days after the expiration 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 taxable calendar for which 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, no liability may arise in consequence of release of any lien imposed with respect to any internal revenue tax.

(b) **Validity Satisfied In Subsequent.** — The Secretary shall treat the liability for the amount otherwise, together with an interest in respect thereof, as being fully satisfied or has become legally unenforceable in:

(1) **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 relating to terms, conditions and form of the bond and coupled therewith as may be specified by such regulations.

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

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

(1) **Disclosure of amount of outstanding tax.** — If a notice of lien has been filed pursuant to section 6323(b), the amount of the outstanding obligation secured 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.