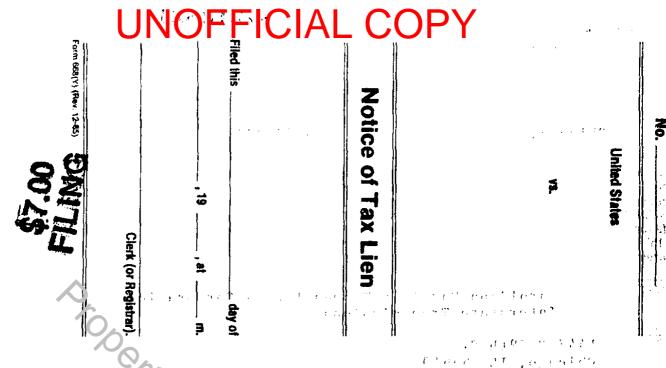
Form 668(Y)

(Rev. December 1985)	Notic	Notice of Federal Tax Lien Under Internal					Revenue Laws		
District ⓒ Ci	nicago, IL		Serial Number	368719	775	For Optional Use by Recording Office			
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ignature	for Dorot 36-01	hy O. S	mith	Title		Chief	Collect.		

(NOTE: Certificate of officer authorized by law to take acknowledgments is not essential to the validity of Notice of Federal Tax ilen. Rev. Rul. 71-486, 1971 - 2 C.B. 409)

Form **668(Y)** (Rev. 12-85)



Excerpts From Internal Revenue Code

Sec. 6321. Lien For Taxes.

If any person liable to pay any lax 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 fien imposed by seption 8321 shall erise at the time the assessment is made and shall continue 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) Furchaser's, Holders Of Security Interests, Mechanic's Lienors, And Judgment Lien Creditors. — The lien imposed by section 5321 shall not be raid as against any purchaser, holder of a security interest faschanic's lienor, or judgment lien creditor until notice thereof-majich meets the requirements of subsection (f) has been filed by the Secretary.

(f) Place For Filing Notice; Form .--

(1) Place For Filling - 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 taws 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 auddivision), as designated by the laws of such State, in which the property subject to the lien is situated; or

(B) With Clark Of District Court - In the office of the clark of the United States district court for the judicial district in which when property subject to lien is situated, whenever the State has a not by law designated one office which meets the requirements of subparaoraph (A), or

(C) With Recorder of Beeds 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 (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 tangayer at the time the notice of lien is filled.

Full purpose of paragraph (2) (B), the residence of a corporation or purtor, who shall be deemed to be the place at which the principal executive office of the business is located, and the residence of a "mayer whose residence is without the United States shall be reemed to be in the District of Columbia.

- (3) Form - Tr / form and content of the notice referred to in sub-action (a) shall be prescribed by the Secretary. Such notice and be valid notwithstanding any other provision of law decreting the form or content of a notice of lies.

Note: See section 6323(b) for protection for certain interests even though notice of lien imposed by section 6321 is filled with respect to:

- 1. Securities
- 2. Motor vehicles
- 3. Personal property purchased at retail
- 4. Personal property purchased in casual sale
- Personal property subjected to possessory lien
 Real property tax and special assessment liens
- 7. Residential property subject to a mechanic's
- lien for certain repairs and improvements
- 8. Attorney's Ilens
- 9. Certain insurance contracts
- 10. Passbook loans
- (g) Refilling O1 Notice. For purposes of this section
- (1) General Rule. Unless notice of lien is reflied in the manner prescribed in paragraph (2) during the required refling period, such notice of lien shall be treated as filled on the date on which it is filled (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 -

(I) such notice of lien is reflied in the office in which the prior notice of lien was filed, and

 (ii) in the case of real property, the fact of retilling 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 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) the State in which such residence is located.

(3) Required Refiling Period. — In the case of any notice of lien, the term "required refilling 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, and (B) the one-year period ending with the expiration of 6 years after the close of the preceding required refiling period fer such notice of lien.

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

(a) Release Of Lieft. — Subject to such regulations as the Secretary may prescribe, the Secretary shall issue a certificate of release of any ilen imposed with respect to any internal revenue tax not tater 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 unanforceable; 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 therrun, within the time prescribed by law (including any ext maion of such time), and that is in accordance with such requirement of the bond and surviver increase, as may be specified by such regulations.

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

Return Information For Tax Administration Purposes.

(2) Disclosure of amount of outstanding iten. If a notice of lien has been filled pursuant to section 6323(f), the amount of the outstanding obligation secured by such lien may be disclosed to any person who furnishes satisfactory written evidence that lie has a right in the property subject to such lien or intends to obtain a right in such property.

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