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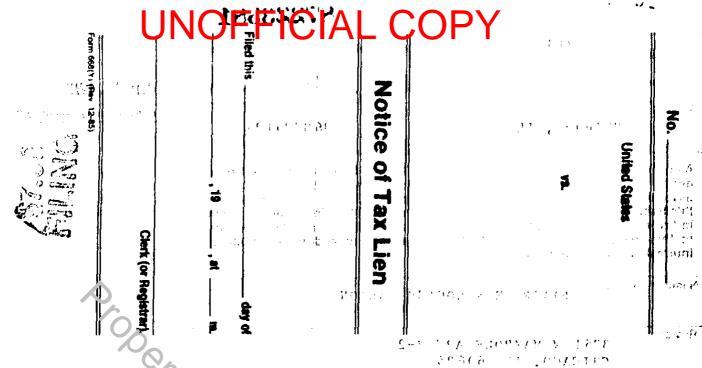
Department of the Treasury - Internal Beverius Spyles

w. December 1965)	Note	ice of F	ederal T a x	Lien Unde	r Internal l	Revenue La	WS
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CREANT RELEASE INFORMATION: With aspect to each assessment listed below, unless efficient is reflied by the date given in column (+), this notice shall, on the day following ich date/operate as a certificate of release as defined in IRC 6326(s).						Sec. 6321 Flen For Florer With and the control of the same and the control of th	
bolian prilita les	Tex Period Ended (b)	identify	ring Number	Date of Assessment (d)	Last Day for Refiling (e)	of As	d Balance
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for Dorothy O. Smith 36 **-**0 1 **-**0000

Chief Collect.

(NOTE: Certificate of officer authorized by law to take seknowledgments & for sessional to the validity of Notice of Federal Tax lien. Rev. Rul. 71-486, 1971 - 2 C.B. 409)



Excerpts From Internal Revenue Cox

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 6821 shall arise 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 (liablility) is satisfied or becomes unenforceable by reason of lance of time.

Sec. 6323. Validity and Priority Against Certain Persons.

M Purchaser's, Holders Of Security interests, Mechanic's Lienors, And Judgment Lies Creditors. — The lien imposed by section 8321 shall not be failed 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 (f) has been all by the Secretary.

(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 one office within the State for the county, or other governmental sobdivision), 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;

(8) With Clark 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 lian is situated, whenever the State has not by law designated one office which meets the requirements of subparagraph (A), or

(C) With Recordar 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 grown COUNTY, HILIKU'S 3 F (1)

(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 taxpa or at the time the notice of lien is filed.

For purposes of paragrash (Z) (B), the residence of a corporation or partnership shall be deemed to be the place at which the principal executive office of the business is located, and the residence of a lar ever whose residence is without the United States shall be deer led to be in the District of Columbia.

(3) Form - The Jorna and contant of the notice referred to in subsection (a) shall be prescribed by the Secretary. Such notice shist b) valid notwithstanding any other provision of law regardler the form of content of a

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

- Securities
- Motor vehicles
- Personal property purchased at retail
- Personal property purchased in casual sale
- Personal property subjected to possessory lien Real property tex and special assessment liens
- Residential projectly aubject to a mechanic's lien for certain repairs and improvements
- Attorney's liens
- Certain insurance contracts
- 10. Pasebook loans
- (g) Refiling Oi Notice. For purposes of this section
- (1) General Rule. Unless notice of lien is refiled in the manner prescriber 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 (ii)) after the expiration of such rifiling period
- (2) Place For Filing. Amotice of tien refiled during the required reft his mriad shall be ethodise bhly (A) if
 - (i) such notice of lien is refiled in the office in which the prior notice of tien 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 sübsection (4) (4) and
 - (B) in any case in which, 90 days or more prior to the date of a retiling of notice of tien under subparagraph (A), the

Secretary received written information (in the manner prescribed in regulations issued by the Secretary) poncerning a change in the taxpayer's residence, if a notiof such lien is also filed in accordance with subsection (1) in the State in which such residence is leceted. ;

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(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 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 refilling period for such notice of tien.

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

- (a) Release Of Liert. 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) Elablity 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 as wited by him a bond that is conditioned upon the payment of amount assessed, together with all interest in respect thereof, within the time prescribed by law (including any extension of sinh time), and that is in accordance with such requirements "ala" in to terms, conditions, and form of the bond and sureties throson, as may be specified by such regulations.

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

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

 Disclosure of amount of outstanding lien. - If a notice of tien has been filed pursuant to section 6373(f), 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.

FILED FOR RECORD