Form 688/Y)

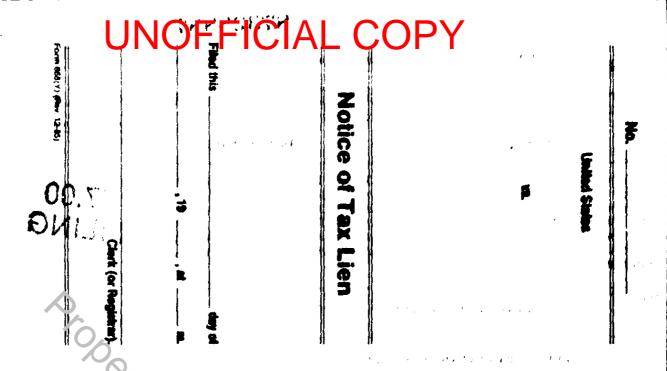
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Department of the Treasury - Internal Revenue Service

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(Rev. December 1985)	Notice of Federal Tax Lien Under Internal Revenue Laws								
District	Serial Number			For Optional Use by Recording Office					
As provided by notice is give assessed againg this liability had in favor of the to this taxpay interest, and co	n that taxes not the follow is been made, United States er for the am	save been syment of re is a lien belonging	7.00 FILING						
ame of Taxpaye		Mitchell							
40	O E Rande	15h Apt 2513							
IMPORTANT REL	LEASE INFORMAT	TION: With respect to each a given in column (e), this no if release as Uning in IRC 6	tice shall, on the da			,			
Kind of Tax	Tax Period Ended (b)	(dentifying Number	Date of Assessment (d)	Last Day for Refiling (a)	Unpaid Bala of Assessin (1)				
CIVP	6-30-84		4-12-85	5-12-91	8110	.74			
				L Clerk	SOME CO	87328887			
ace of Filing	Record Gook C Chicag	Total	8	110.74					
ila notice was p	repared and sig	ned at Chicag	o, IL			, on this,			
• 10 thday c	June	19	I San						
gnature	for J. Sc 36-01		Title		Revenue	Officer			

(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)



Expensis From Internal Revenue Coun

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 they accrue in addition thereto) shall be a lien flever of the United States upon all property and rights to preparty, whether real or personal, belonging to such person.

Sec. 6322. Period Of Lien.

Unless another date is apecifically fixed by law, the lien imposed by section \$321 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 liability) is satisfied or becomes unenforceable by reason of lagge of time.

Sec. 6323. Validity and Priority Against Certain Persons.

(a) Purchaser's, Holders Of Security Interests, Mechanic's Lienors, And Judgment Lien Greditors.— The lien imposed by section 6321 shall not by 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 (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 filled -

(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), so 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 for the judicial district in which the property subject to lien is situated, whenever the State has not by law designated one office which meets the requirements of subparadraph (A), or

(C) With Recorder Of Deeds Of the District Of Columbia in the effice 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 sees of real property, at its physical location; or

(B) Personal Property - in the case of personal property, climber tangible or intangible, at the residence of the taxo yer at the time the notice of lien is filed.

For purpose of paragraph (2) (8), the residence of a corporation or perceives it peaks to deemed to be the place at which the principal or active office of the business is leasted, and the residence or or servaries retices residence is without the United States shall be yet med to be in the District of Columbia.

(3) Form - The room and content at the notice referred to in subsection (a) shall be prescribed by the Secretary. Such notice of all the valid notwithstanding any other provision of law reparting the form or content of a notice of lies.

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

- 1. Securities
- 2. Motor vahicies
- 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.
- Residential property subject to a mechanic's flen for certain repairs and improvements
- 8. Attorney's liens
- 9. Certain insurance contracts
- 10. Passbook loans
- (g) Refilling Of Notice. For purposes of this section -
- (1) General Rule, Unless notice of lien is riefled in the manner prescribed in paragraph (2) during the required refilling period, such notice of lien shall be treated as filed on the date on which it is filled (in accordance with subsection (ff) after the expiration of such refilling period.
- (2) Place For Filing. A notice of lien refiled during the required refiling period shall be effective only.

(A) (f-

 such notice of lien is tested in the office in which the prior notice of lien was filed, and

(ii) in the case of real-pagearty, the fact of refiling is entered and recorded in an index to the extent required by subsection (f) (f) 200.

(B) in any case of which to day or near piny to bodate of a refiling of notice of lies under subparted any file. Its

Borreary received errition information (in the mailter practribed in regulations leaved by the Secretary) concerning a change in the targetyer's residence, if a notice of such lies is also filled in accordance with subsection (i) in the State in which such residence is leasted.

(3) Required Refling Period. — In the gase of any notice of lien, the term "required refiting period" make.

(A) the one-year period ending 30 days after the expitation of 6 years after the date of the accessment of the tax, and (B) the one-year period ending with the expiration of 6 years after the close of the preceding required refling period for each notice of lien:

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

- (a) Release Of Lieft. Subject to each regulations as the Secretary may prescribe, the Secretary shall leave a certificate of release of any iten imposed with respect to any internal revenue tax not later than 30 days after the day an which.
- (1) Liability Satisfied or Unembrosable The Secretary finds that the liability for the amount assessed, tegether with all interest in respect thereof, has been fully estimated or has become tegally unembrosable; or
- (2) Bond Accepted. There is furnished to the Secretary and architect day him a bond that is conditioned upon the payment of the amount assessed, together with all interest in respect thereof architect the time prescribed by law including auch arcents on of Juch Ilme), and that is in accordance with such requirements architect architect, and form of the bond and sureties to zero, as may be specified by each regulations.

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

- (k) Disclosure of Certain Returns and Return Information For Tax Administration Puzzoses,
- (2) Discissure of amount of outstanding Iren If a notice of Iren has been filled pursuant to section 6323(f), the amount of the outstanding obligation secured by such lier may be disclosed to any person who turnishes satisfactory written evidence that he has a right in the property subject to such Iren or Imanes to optain a right in such property.

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