

# UNOFFICIAL COPY

Form 668(Y)

148

Department of the Treasury - Internal Revenue Service

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(Rev. December 1985)

## Notice of Federal Tax Lien Under Internal Revenue Laws

District <b>Chicago, IL</b>	Serial Number <b>368815187</b>	For Optional Use by Recording Office
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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.

8-133695

Name of Taxpayer **LEON A. WILKINSON**

Residence **1000 NORTH LAUREL #312  
CHICAGO, IL 60610**

**IMPORTANT RELEASE INFORMATION:** With respect to each assessment listed below, unless notice of lien is refilled 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(e).

Kind of Tax (a)	Tax Period Ended (b)	Identifying Number (c)	Date of Assessment (d)	Last Day for Refiling (e)	Unpaid Balance of Assessment (f)
1040	12/31/70	318-22-7703	11/10/86	12/10/92	6800.05
1040	12/31/71	██████████	11/10/86	12/10/92	7474.26
1040	12/31/73	318-22-7703	11/10/86	12/10/92	14534.00
1040	12/31/74	318-22-7703	11/10/86	12/10/92	15791.30

88-133695

Place of Filing: Recorder of Deeds, Cook County, Chicago, IL 60602. Total \$ **44399.61**

This notice was prepared and signed at **Chicago, IL** on this **26th** day of **August**, 19**88**.

Signature: *[Signature]* Title: **Recorder of Deeds**

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

\$7.00 FILING

Notice of Tax Lien

SEP 22 11 09 AM '68

FILED FOR RECORD JEFFERSON COUNTY, ILLINOIS

88433695

Form 601 (7-68)

Chief of Registry

State Seal

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 interest, addition to tax, or assessed 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 6321 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 payment, enforceable by process of law, is made.

Sec. 6323. Validity and Priority Against Certain Persons.

(a) Purchaser, Holders Of Security Interests, Mortgagees, Lienors, And Judgment Lien Creditors. - The lien imposed by section 6321 shall not be valid against any purchaser, holder of a security interest, mortgagee, lienor, or judgment lien creditor who acquires his interest through a bona fide purchaser of such interest if such bona fide purchaser of such interest has been filed by the Secretary.

(b) Place For Filing Notice, Etc. -

(1) State 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 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;

(3) 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 the lien is situated, whenever the State has not provided for the filing of such notice in accordance with the requirements of subsection (b); and

(4) With Recorder Of Deeds Or The Officer Or Corporation. - In the office of the Recorder of Deeds or 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 (3), 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, other than tangible or intangible, at the residence of the taxpayer at the time the notice of lien is filed.

(3) Situs Of Property Subject To Lien. - For purposes of paragraphs (1) and (3), the residence of a corporation or partnership shall be deemed to be the place at which the principal or chief office of the business is located, and the residence of a partner whose residence is within the United States shall be deemed to be in the District of Columbia.

(4) Form. - The form and content of the notice referred to in subsection (a) shall be prescribed by the Secretary. Such notice of lien is valid notwithstanding any other provision of law relating to the form or content of a notice of lien.

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

1. Securities
2. Motor vehicles
3. Personal property purchased at retail
4. Personal property purchased in court sale
5. Personal property designated to partnership
6. Real property and real estate interests
7. Real estate property subject to a purchase money lien
8. Attorney's fees
9. Certain financial contracts
10. Passbook loans

(5) Noticing Of Notice. - For purposes of this section -

(i) General Rule. - Unless notice of lien is mailed in the manner prescribed in paragraph (2) during the required mailing period, such notice of lien shall be treated as filed on the date on which it is filed in accordance with subsection (b) after the expiration of such mailing period.

(ii) Place For Filing. - A notice of lien mailed during the required mailing period shall be effective only -

- (i) if such notice of lien is mailed in the office in which the principal office of the taxpayer is located;
- (ii) in the case of real property, and fact of mailing is entered and recorded in accordance with the extent required by subsection (b) (1); and
- (iii) in any case in which, 60 days or more prior to the date of a mailing of notice of lien under subsection (a) (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 (b) in the State in which such residence is located.

(3) Required Mailing Period. - In the case of any notice of lien, the term "required mailing period" means -

- (A) the one-year period ending 30 days after the expiration of 5 years after the date of the assessment of the tax; and
- (B) the one-year period ending with the expiration of 5 years after the close of the preceding required mailing period for such 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, 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) 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 unenforceable; 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 thereof, and in the time prescribed by law (including any extension of such time), and that such a condition will make responsible the obligors in such bond, and that all the laws and orders relating to such bond are complied with by such obligors.

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

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

(2) Disclosure of amount of outstanding lien. - If a notice of lien has been filed pursuant to section 6321, the amount of the outstanding obligation secured by such lien may be disclosed to any person who furnishes appropriate written evidence that he has a right in the property subject to such lien or wishes to obtain a right in such property.