

UNOFFICIAL COPY

Form 668(Y)

215

Department of the Treasury - Internal Revenue Service 9 1 7

(Rev. December 1985)

Notice of Federal Tax Lien Under Internal Revenue Laws

District

Chicago, IL

Serial Number

36815663

For Optional Use by Recording Office

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.

88-173917

Name of Taxpayer JAMES A. CARLSON

Residence 8154 SEMINOLE STREET
DELAWARE PARK, IL 60462

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 6323(a).

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)
730	09/30/87	36-2847940	10/31/87	11/30/93	63.85
730	10/31/87		11/30/87	12/30/93	72.20
730	12/31/87	36-2847940	04/18/90	05/18/94	916.19

Place of Filing

Recorder of Deeds
Cook County
Chicago, IL 60602

Total

1052.24

This notice was prepared and signed at Chicago, IL on this

the 1st day of September 88

Signature


FOR THE OFFICE

Title

Revenue Officer
36-01-2623

(NOTE: Certificate of officer authorized by law to take acknowledgments is not essential to the validity of Notice of Federal Tax Lien)
Rev. Rul. 71-488, 1971-2 CB 409

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

Part 1: kept by Recording Office

\$7.00 FILING

Notice of Tax Lien

RECORDED FOR RECORD DEPT. COUNTY, ILLINOIS

88-333817

United States

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, additional amount, addition to tax, or assessment 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 becomes unenforceable by reason of lapse of time.

Sec. 6323. Validity and Priority Against Certain Persons.

(a) Purchaser's, Holders Of Security Interests, Mechanics' Liens, And Judgment Lien Creditors. - The lien imposed by section 6321 shall not be valid as against any purchaser, holder of a security interest, mechanic's lien, or judgment lien creditor until notice thereof which complies with the requirements of subsection (b) has been filed by the Secretary.

(b) Place For Filing Notice Form.

(1) Place For Filing. - The notice provided in this subsection shall be filed - (A) Under State Law. - In the case of real property, in the office or in the State for the records, whether governmental or otherwise, as designated by the chief of such office in which the property subject to the lien is situated; or (B) Personal Property. - In the case of personal property, in the office or in the State for the records, whether governmental or otherwise, as designated by the chief of such office in which the property subject to the lien is situated.

(2) Other 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 taxpayer at the time the notice of lien is filed.

For purposes of paragraph (1) (B), the residence of a corporation or partnership shall be deemed to be the place at which the principal office or office 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) Form. - The form and content of the notice 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.

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 to liquidate
5. Personal property subject to voluntary lien
6. Real property and other secured interests
7. Accidental property subject to a purchaser's lien
8. Accidental liens
9. Certain other secured interests
10. Bankers' liens

(c) Ranking Of Notice. - The purposes of this section.

(1) General Rule. - Unless notice of lien is reflected in the manner prescribed in paragraph (b) during the required waiting period, such notice of lien shall be treated as filed on the date on which it is filed in accordance with subsection (b) with the Secretary or with respect to such property.

(2) Place For Filing. - A notice of lien filed during the waiting period shall be effective only -

- (A) if such notice of lien is reflected in the office in which the principal office of the taxpayer is located; and
(B) in the case of real property, the fact of filing is entered and recorded in an index to the extent required by subsection (b) (B), and
(C) in any case in which, 30 days or more prior to the date of a filing 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 (b) in the State in which such residence is located.

(3) Required Waiting Period. - In the case of any notice of lien, the term "required waiting 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 waiting 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) Lien Satisfied. - 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 as to form, conditions, and form of the bond and number thereon, as may be prescribed by such regulations.

Sec. 6303. Confidentiality and Disclosure of Returns and Return Information.

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

(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 satisfactory written evidence that he has a right in the property subject to such lien or intends to obtain a right in such property.