

# UNOFFICIAL COPY

Form 688(Y)

148

Department of the Treasury - Internal Revenue Service

(Rev. December 1985)

## Notice of Federal Tax Lien Under Internal Revenue Laws

District Chicago, IL	Serial Number 368816313	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.

a Corporation

Name of Taxpayer INTERNATIONAL DIAGNOSTIC IMAGING  
INC  
INTERSTATE TMResidence 1100 REMINGTON RD  
SCHAUMBURG, IL 60195

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 6325(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)
941	12/31/86	██████████	08/04/88	09/03/94	49925.62
941	03/31/87	██████████	08/04/88	09/03/94	35558.76
941	06/30/87	██████████	08/04/88	09/03/94	44561.77
941	09/30/87	██████████	08/04/88	09/03/94	38979.92
941	12/31/87	██████████	08/12/88	09/11/94	31805.36
941	03/31/88	██████████	08/12/88	09/11/94	3087.48
940	12/31/86	██████████	08/04/88	09/03/94	7144.71
940	12/31/87	██████████	08/12/88	09/11/94	1056.00

Place of Filing Recorder of Deeds Cook County Chicago, IL 60602	Total	3	212120.58
--	-------	---	-----------

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

the 9th day of September 88

Signature For B. Jackson	Title Revenue Officer 36-01-3407
-----------------------------	--

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;

Form 688(Y) (Rev. 12-85)

Part 1 - Kept By Recording Office

7.00  
FILING

Clerk (or Register)

Notice of Federal Tax Lien

Form 601 (Rev. 11-15-83)
Name: PAYEE INTERNATIONAL DEPOSITARY INC
Address: 1100 PENNINGTON RD, SCHMIDTOWN, IL 60492
No. 28 SEP 28 1986

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 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 6321 shall arise at the time the assessment is made and shall continue until the liability for the amount 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) Purchasers, Holders Of Security Interests, Mechanics' Lienors, 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 lienor, or judgment creditor who takes thereunder which meets the requirements of subsection (b) hereinafter provided by the Secretary.

(b) 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 office within the State for 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 one office within the State (or in a county, or other governmental subdivision), as designated by the laws of such State, in which the property subject to the lien is situated; or
(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 subparagraph (A), or
(C) With Recorder 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 District of Columbia.

(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.
(c) Real Property - In the case of real property, in the office within the State for the county, or other governmental subdivision, as designated by the laws of such State in which the property subject to the lien is situated.

(2) Secured Parties. - The lien and amount of the liability referred to in subsection (a) shall be prioritized by the Secretary. Creditors of the taxpayer who are holders of a lien on the property shall be prioritized in the following order:
1. Secured parties
2. Motor vehicle
3. Personal property purchased at retail
4. Personal property purchased in casual sale
5. Personal property subject to mechanics' lien
6. Real property tax and special assessment liens
7. Mechanic's lienor, holder of a security interest, or judgment creditor
8. Judgment creditor
9. Other creditors

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

- (3) Secured Parties. - The lien and amount of the liability referred to in subsection (a) shall be prioritized by the Secretary. Creditors of the taxpayer who are holders of a lien on the property shall be prioritized in the following order:
1. Secured parties
2. Motor vehicle
3. Personal property purchased at retail
4. Personal property purchased in casual sale
5. Personal property subject to mechanics' lien
6. Real property tax and special assessment liens
7. Mechanic's lienor, holder of a security interest, or judgment creditor
8. Judgment creditor
9. Other creditors

(c) Rolling Of Notice. - For purposes of this section -

- (1) General Rule. - When notice of lien is filed in the manner prescribed in paragraph (b) during the required rolling period, such notice of lien shall be treated as filed on the date on which it is filed (the date on which the notice is filed and the application of such notice of lien).
(2) Place For Filing. - A notice of lien rolled during the required rolling period shall be treated as filed -
(A) In the office within the State for 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
(B) In the case of real property, 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 by law designated one office which meets the requirements of subparagraph (A), or
(C) In the case of the District of Columbia, 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.

Secretary receives written information from the taxpayer or other person that the taxpayer is in compliance with the requirements of section 6321, the Secretary shall, in the case of a lien imposed by section 6321, issue a notice of release of lien to the taxpayer and to the person to whom the lien is claimed to be enforceable.

(b) Required Rolling Period. - In the case of any notice of lien, the term "required rolling period" means -
(A) the one-year period ending 30 days after the application 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 rolling 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 thereto, 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 all amounts assessed, together with all interest in respect thereto, and the time prescribed by law (including any extension of such time), and that it is in accordance with such requirements relating to terms, conditions, and form of the bond and transfer of title, or may be provided by such regulations.

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

(2) Disclosure of amount of outstanding lien. - If a notice of lien has been filed pursuant to section 6321, the amount of the outstanding liability secured by such lien may be disclosed to any person who has a security interest in the property which he has a lien in the property subject to such lien or intends to obtain a lien in such property.

At a distance of 100 feet from the property... (faint text)