

UNOFFICIAL COPY

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

Rev. Rul. 71-466, 1971-2 CB 409

(NOTE: Certificate of Officer Authorized by Law to take acknowledgments is not essential to the validity of Notice of Federal Tax Lien)

Part 1 - Kept by Recording Office

Form 668(Y)

218

Department of the Treasury - Internal Revenue Service

Notice of Federal Tax Lien Under Internal Revenue Laws

For Optional Use by Recording Office

District: Chicago, IL
 Serial Number: 369817882

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.

Name of Taxpayer: LOUISE COOPER

Residence: 3515 SOUTH COTTAGE GROVE
 CHICAGO, IL 60653-1457

IMPORTANT RELEASE INFORMATION: With respect to each assessment listed below, unless notice of lien is relied 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)
1040	12/31/84	322-14-5712	07/06/87	08/05/93	2314.62
Total					2314.62

88525575

Property of Cook County

Place of Filing: Recorder of Deeds
 Cook County
 Chicago, IL 60602

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

the 3rd day of October, 19 88

Signature: *[Signature]*
 Title: Revenue Officer
 For G. Lawler 2629
 36-01-2629

No. _____

United States

vs.

Notice of Tax Lien

NOV 15 1968 13

Filed this 88525575 day of 19 at ml.

Clerk (or Registrar).

Form 6681 (Rev. 12-65)

Excerpt 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 and 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 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) Purchasers, 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 meets the requirements of subsection (f) has been filed by the Secretary.

(f) 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 (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 one office within the State (or the county, or other governmental subdivision), as designated by the laws of such State.

(g) Place For Filing.

(1) A notice of lien referred to in subsection (a) shall be effective only during the required retelling period specified in subsection (f).

(h) General Rule.

(1) Unless notice of lien is referred to in paragraph (2) during the required retelling period, such notice of lien shall be treated as filed on the date on which it is filed in accordance with subsection (f) after the expiration of such retelling period.

(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 taxpayer at the time the notice of lien is filed.

For purposes of paragraph (2) (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 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 real property tax and special assessment liens.

- 7. Residential property subject to mechanic's liens for certain repairs and improvements.
- 8. Attorney liens.
- 9. Certain insurance contracts.
- 10. Passbook loans.

(4) Retelling Of Notice. - For purposes of this section -

- (1) General Rule. - Unless notice of lien is referred to in paragraph (2) during the required retelling period, such notice of lien shall be treated as filed on the date on which it is filed in accordance with subsection (f) after the expiration of such retelling period.

(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.

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 (f) in the State in which such residence is located.

(c) Required Retelling Period. - In the case of any notice of lien, the term "required retelling period" means - (A) the one-year period ending 30 days after the expiration of any notice of lien, the term "required retelling period" means - (B) the one-year period ending with the expiration of 6 years after the date of the assessment of the tax, and (C) the one-year period ending with the expiration of 6 years after the date of the preceding required retelling period for such notice of lien.

(d) Release Of Lien Or Discharge Of Property. - 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, within 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 as are prescribed by such regulations.

(e) Sec. 6103. Confidentiality and Disclosure of Returns and Return Information. -

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

(3) Such notice of lien is referred to in the office in which the prior notice of lien was filed, and (ii) in the case of real property, the fact of retelling is entered and recorded in an index to the extent required by subsection (1) (A), and (B) in any case in which 90 days or more prior to the date of a retelling of notice of lien under subparagraph (A), the

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Office