

# UNOFFICIAL COPY

Form 608(V)

26

Department of the Treasury - Internal Revenue Service

(Rev. December 1985)

## Notice of Federal Tax Lien Under Internal Revenue Laws

District	Serial Number	For Official Use by Recording Office			
Chicago, IL	366819725				
<p>As provided by sections 6321, 6322, and 6325 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 tax(s) 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.</p>					
<p>Name of Taxpayer RUSAGER &amp; SHEILA PARKER</p>					
<p>Residence 2630 E 75th CHICAGO, IL 60645-2904</p>					
<p><b>IMPORTANT RELEASE INFORMATION:</b> With respect to each assessment listed below, unless notice of lien is filed 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 TMC 6029(a).</p>					
Type of Tax	Tax Period Encl'd	Identifying Number (b)	Date of Assessment (c)	Last Day for Filing (d)	Unpaid Balance of Assessment (f)
1040	12/31/86	358-42-0154	01/01/87	07/01/93	4261.32
1040	12/31/87	358-42-0154	05/30/88	06/29/94	1845.39
<p><b>NOTE:</b> If you do not file a timely claim for refund or credit against the above tax(s), or if you do not file a timely petition for redetermination of the above tax(s), or if you do not file a timely suit against the above tax(s) in a court of competent jurisdiction, the unpaid balance of the above tax(s) will become due and payable on the last day for filing, as shown in column (d). You will then be liable for interest and penalties on the unpaid balance of the above tax(s) from the date of assessment until the date of payment.</p>					
<p><b>Place of Filing</b> Recorder of Deeds Cook County Chicago, IL 60602</p>					
<p>This notice was prepared and signed at Chicago, IL on November 4, 1988.</p>					
<p>Signature for Dorothy O. Smith</p>					
<p>Title Chief Collect. 36-01-0000</p>					

(NOTE: Certificate of officer authorized to make acknowledgments is not essential to the validity of Notice of Federal Tax Lien  
Rev. Rul. 71-406, 1971-2 C.B. 400)

Form 608(V) (Rev. 12-85)

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## Section Five: Lien For Taxes

### Sec. 6321. Lien For Taxes.

If any person fails to pay any tax, impost or revenue to the same place due and the amount remaining unpaid, interest accrued, failure to file, or otherwise neglects with any cause that may appear to cause thereof, there 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 made or done to apparently bind 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 for a payment 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, Mortgagor's Liens, And Judgment Lien Creditors.** — The lien imposed by section 6321 shall not be valid as against any purchaser, holder of a security interest, mortgagor, or judgment lien creditor until notice thereof is given under the requirements of subsection (b) has been had by the Secretary.

#### In Place For Filing Notice; Form.—

(1) **Place For Filing.** — The notice referred to in subsection (b) shall be filed:

##### At Uncle Sam's Office.

(A) **Real Property.** — In the case of real property, in one 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) **Personal Property.** — In the case of personal property, whether tangible or intangible, in one 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;

(C) **U.S. Court Or 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 by law designated another office which meets the requirements of subparagraph (A); or

(D) **U.S. Recorder Of Deeds Or The Chancery Of Columbia.** — In the office of the recorder of deeds or the chancery of Columbia, if the property subject to the lien is situated in the District of Columbia.

(b) **Copies of the documents referred to above.** — The notices referred to in subsection (a), properly signed, shall be deemed to be sufficient.

(c) **Form Property.** — In the case of real property, in the office of the Commissioner of Internal Revenue, or in the office of the Commissioner of Patents, or in the office of the Commissioner of the Patent Office, or in the office of the Commissioner of the Bureau of Land Management, or in the office of the Commissioner of Fish and Game.

(d) **Personal Property.** — In the case of personal property, in the office of the Commissioner of Internal Revenue, or in the office of the Commissioner of Patents, or in the office of the Commissioner of the Bureau of Land Management, or in the office of the Commissioner of Fish and Game.

(e) **Failure To File.** — The form and account of the notice referred to in each case shall be filed in the office of the Commissioner of Internal Revenue, or in the office of the Commissioner of Fish and Game, or in the office of the Commissioner of Patents, or in the office of the Commissioner of the Bureau of Land Management, or in the office of the Commissioner of the Patent Office, or in the office of the Commissioner of the Bureau of Land Management, or in the office of the Commissioner of Fish and Game.

**Note:** See section 6323(a) for protection for certain interests over which a notice of lien imposed by section 6321 is filed with respect to:

1. Securities
2. Other interests
3. Personal property purchased at retail
4. Personal property purchased in general line
5. Personal property contributed to partnership firm
6. Real property held and operated as business firm
7. Residential property subject to simultaneous  
lien for service charges and improvements
8. Attorney's fees
9. Certain insurance companies
10. Postpaid taxes

(f) **Recording Of Notice.** — For purposes of section 6321:

(1) **General Rule.** — Upon notice of the filing of the notice provided in paragraph (b) during the required recording period, such notice of the lien shall be deemed filed in the case of which it is filed or acknowledged when acknowledged and signed.

(2) **Place For Filing.** — A notice of the filing during the required recording period shall be considered duly filed.

(3) **Time Within Which To Record.** — The notice of filing of the lien shall be deemed filed when it is recorded in the office of the clerk of the U.S. Court or District Court.

(4) **In the Case of Real Property.** — The time of filing is extended and increased to an interval of six months measured by calendar days.

(5) **In Any Case Not Within.** — 30 days or more prior to the end of a period of filing of 30 days measured by calendar days.

(6) **Priority.** — The notice of filing of the notice of the lien imposed by section 6321 shall be deemed to be effective to give the notice of the lien priority over all other liens, except those which are prior to the date of filing of the notice of the lien imposed by section 6321.

(7) **Recorded Before Filing.** — If any notice of filing of the notice of the lien imposed by section 6321 is filed before the date of filing of the notice of the lien imposed by section 6321, the notice of filing of the notice of the lien imposed by section 6321 shall be deemed to be filed on the date of filing of the notice of the lien imposed by section 6321.

(8) **Failure To Record.** — If any notice of filing of the notice of the lien imposed by section 6321 is filed before the date of filing of the notice of the lien imposed by section 6321, the notice of filing of the notice of the lien imposed by section 6321 shall be deemed to be filed on the date of filing of the notice of the lien imposed by section 6321.

(9) **Failure To Record.** — If any notice of filing of the notice of the lien imposed by section 6321 is filed before the date of filing of the notice of the lien imposed by section 6321, the notice of filing of the notice of the lien imposed by section 6321 shall be deemed to be filed on the date of filing of the notice of the lien imposed by section 6321.

(10) **Failure To Record.** — If any notice of filing of the notice of the lien imposed by section 6321 is filed before the date of filing of the notice of the lien imposed by section 6321, the notice of filing of the notice of the lien imposed by section 6321 shall be deemed to be filed on the date of filing of the notice of the lien imposed by section 6321.

(11) **Failure To Record.** — If any notice of filing of the notice of the lien imposed by section 6321 is filed before the date of filing of the notice of the lien imposed by section 6321, the notice of filing of the notice of the lien imposed by section 6321 shall be deemed to be filed on the date of filing of the notice of the lien imposed by section 6321.

(12) **Failure To Record.** — If any notice of filing of the notice of the lien imposed by section 6321 is filed before the date of filing of the notice of the lien imposed by section 6321, the notice of filing of the notice of the lien imposed by section 6321 shall be deemed to be filed on the date of filing of the notice of the lien imposed by section 6321.

(13) **Failure To Record.** — If any notice of filing of the notice of the lien imposed by section 6321 is filed before the date of filing of the notice of the lien imposed by section 6321, the notice of filing of the notice of the lien imposed by section 6321 shall be deemed to be filed on the date of filing of the notice of the lien imposed by section 6321.

(14) **Failure To Record.** — If any notice of filing of the notice of the lien imposed by section 6321 is filed before the date of filing of the notice of the lien imposed by section 6321, the notice of filing of the notice of the lien imposed by section 6321 shall be deemed to be filed on the date of filing of the notice of the lien imposed by section 6321.

(15) **Failure To Record.** — If any notice of filing of the notice of the lien imposed by section 6321 is filed before the date of filing of the notice of the lien imposed by section 6321, the notice of filing of the notice of the lien imposed by section 6321 shall be deemed to be filed on the date of filing of the notice of the lien imposed by section 6321.

(16) **Failure To Record.** — If any notice of filing of the notice of the lien imposed by section 6321 is filed before the date of filing of the notice of the lien imposed by section 6321, the notice of filing of the notice of the lien imposed by section 6321 shall be deemed to be filed on the date of filing of the notice of the lien imposed by section 6321.

(17) **Failure To Record.** — If any notice of filing of the notice of the lien imposed by section 6321 is filed before the date of filing of the notice of the lien imposed by section 6321, the notice of filing of the notice of the lien imposed by section 6321 shall be deemed to be filed on the date of filing of the notice of the lien imposed by section 6321.

(18) **Failure To Record.** — If any notice of filing of the notice of the lien imposed by section 6321 is filed before the date of filing of the notice of the lien imposed by section 6321, the notice of filing of the notice of the lien imposed by section 6321 shall be deemed to be filed on the date of filing of the notice of the lien imposed by section 6321.

(19) **Failure To Record.** — If any notice of filing of the notice of the lien imposed by section 6321 is filed before the date of filing of the notice of the lien imposed by section 6321, the notice of filing of the notice of the lien imposed by section 6321 shall be deemed to be filed on the date of filing of the notice of the lien imposed by section 6321.