## **UNOFFICIAL COPY**

Form 668(Y)

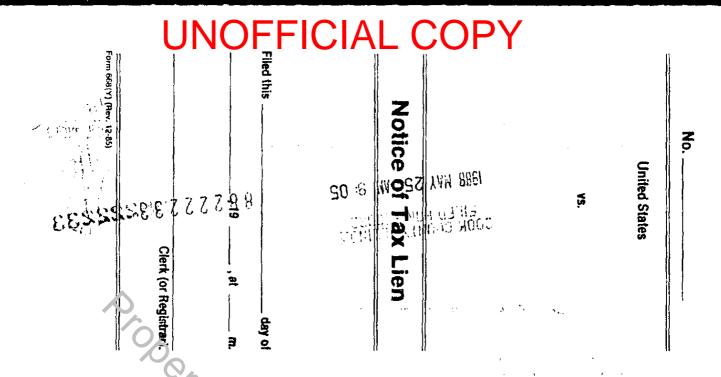
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Department of the Treasury: Internal Revenue Service

(Rev. Decamber 1985)

## Notice of Federal Tax Lien Under Internal Revenue Laws

	140110	e of federal fa				
District	niaago, IL	Serial Numb	oer 368809	<del></del> -	For Optional Use	by Recording Office
As provided be notice is given assessed against the liability had not been asked to the control of the control that the control the control the control that the control the control that the control the control that the control	y sections 6321 en thal taxes ( inst the followings been made, b	, 6322, and 6323 of the including interest and including interest and including interest and in all properly and rigornt of these taxes, occure.	he internal Rever and penalties) h Demand for pa J. Therefore, the	nue Code, ave been syment of re is a lien	8822	2233
ime of Taxpayo	er EDGAR E	8 VERNA L MU	LLIN			
	16208 S FIR HARVEY, IL	/6H - ₹0428 				
notice of lien is a	refiled by the date g	ION: With respect to each jiven in column (4), this n release as defined in IRC	otice shall, on the da	olow, unless y following Last Day for	Uno	ald Balance
Kind of Tax	Ended (b)	Identitying Numbar	Assessment (d)	Refiling		asessment
					Ś O	88222233
ice of Filing	Cook C	er of Deeds county or IL 60602		Total	\$	14163,04
s notice was p	prepared and sign		ago, IL			, on this
16th day	May of,					
nature J.	for C. Jo	hnsen -2505	Title		Re	venue Office



## 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 ilen 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 of becomes unenforceable by reason of tapse of time.

Sec. 6323. Validity and Priority Against
Certain Persons.

(a) Purchaser's Holders Of Security Interests, Mechanic's Lienors, And Judgment Lien Creditors. — The lien Imposed by section 6321 shall not be valid as against thy purchaser, holder of a security interest, mechanic's lienor, or judgment lien creditor until notice thereof which meets the requirements of subsection (f) has been filled by the Secretary.

## (f) Place For Filing Notice; Form.—

 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, in which the property subject to the flen 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 flan is situated in the District of Columbia.

(A) Resi Property - In the case of real property, at its
physical location; or
 (B) Personal Property - In the case of personal property,

(B) Personal Property - In the case of personal property, the interpolation of intengible, at the residence of the axpayer at the time the notice of tien is filled.

(2) Situs Of Property Subject To Lien - For purposes of

paragraphs (1) and (4), property shall be deemed to be situated -

For purposes of paragraph (2) (8), the residence of a corporation or parameter, chall be deemed to be the place at which the principal executive rilice of the business is located, and the residence of a ray, you whose residence is without the United States shall be deer ed to be in the District of Columbia.

(3) Form - The orm and content of the notice referred to in subsection (a) shall be prescribed by the Secretary. Such notice shribe valid notwithstanding any other provision of taw 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
- Personal property purchased in casual sale.
- 5. Personal property subjected to possessory (fee
  6. Real property tax and special assessment ilens
- Residential property subject to a mechanic's lien for certain repairs and improvements
- 8. Attorney's flens
- 9. Certain insurance contracts
- 10. Passbook loans
- (g) Refiling OI Notice. For purposes of this section
- (i) General Rule. Unless notice of flen is refiled in the manner prescribed in paragraph (2) during the required refilling period, such notice of flen shall be treated as fifed on the date on which it is filed (in accordance with subsection (i)) after the expiration of such refilling period.
- (2) **Place For Filing.** A notice of fien refiled during the required refilling period shall be effective only (A) If -
  - (i) such notice of lien is refiled in the office in which the prior notice of lien was filed, and
  - (ii) in the case of real property, the fact of refilling is entered and recorded in an index to the extent required by subsection (f) (4), and
  - (B) in a. y case in which, 90 days or more prior to the date of a refilling 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 tien is also filed in accordance with subsection (f) in the State in which such residence is tocated.

(3) Required Refiling Period. — in the case of any notice of lien, the term "required refiling 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 refiling period for such notice of lien.

Sec. 6325. Release Of Lien Or Discharge Of Property.

- (a) Release Of Lieft. 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 waitsfied or has become legally unenforceable; or
- (2) Bond Accepted. There is furnished to the Secretary and occepted by him a bond that is conditioned upon the payment of the amount essessed, together with all interest in respect thereof, within the time prescribed by law (including anotherism in of such time), and that is in accordance with such requirements really to terms, conditions, and form of the bond and sureties the such as may be specified by such regulations.
- Sec. 6103. Confidentiality and Disclosure of Returns and Return Information.
- (k) Disclosure of Certain Returns and Return Information For Tax Administration Purposes. —
- (2) Disclosure of amount of outstanding iten. If a notice of lien has been filed pursuant to section 6323(1), 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.