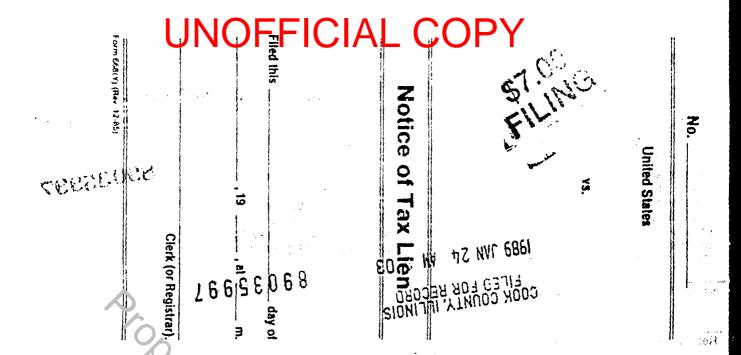
Form 668(Y)

26

Department of the Treasury - Internal Revenue Service

(Rev. December 1985)	Notic	e of Federal Ta	x Lien Unde	r Internal R	levenue Laws	
District	· · · · · · · · · · · · · · · · · · ·	Serial Num	ber		For Optional Use by Recording Office	
Chicago, IL  As provided by sections 6321, 6322, and 6323 of the			368822		890n	
notice is given assessed against liability he in favor of the to this taxpay interest, and c	en that taxes (Inst the following as been made, but United States over for the ampleosts that may accept the states of the state	including interest ing-named taxpayer.  ut it remains unpaid in all property and right of these taxes, crue.	and penalties) h Demand for pr I. Therefore, there ghts to property: , and additional	ave been a syment of the second secon	89035997	
ame or raxpay	er JOE 1-OPEZ		477		<b>.</b>	
	721 W ALTS HICAGO, IL	ELI) 60614-1903				
notice of lien is	reflied by the date g	ON: With respect to each iven in column (e), this n release as dourted in IRC	otice shall, on the da			
Kind of Tax	Tax Period Ended (b)	Identifying Number	Date of Assessment (d)	Last Day for Reflling (8)	Unpaid Balance of Assessment (f)	
1040	12/31/84		05/11/87	05/10/93	4357.55	
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			047	X.		
					<b>a</b> c.	
				Clark	90	
				0/1/	Hara Company	
					Ġ.	
					Ox. 3	
					Office Co.	
ace of Filing					C.O	
regardens Releases All	Recorde CookeiCo Chicago			Total	\$ 4357.55	
(14) (1) (1) (1) (1) (1) (1) (1) (1) (1) (1						
s notice was p	prepared and sign	ed at Chico	igo, IL		, on this	
	of December	1988	· · · · · · · · · · · · · · · · · · ·			
nature	Y. Zavas	enck	Title	Chia	ef Collect.	
for	Dorothy O.	Smith			01-0000	

(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)



## 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 infavor 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 taxbayer 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, Mechanic's Lienors, And Judgment Lien Creditors— The Ilen Imposed by section 8321 shall not be valid as a chinat any purchaser, holder of a security interest, mechanical section, judgment ilen creditor until notice thereof which mean the requirements of subsection (I) has been tilled by the Secretary.

## (f) Place For Filling 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, in which the property subject to the flen is situated; or

(6) 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 flen 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 (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, ..., ther tangible or intengible, at the residence of the taxprijer at the time the notice of lien is filed.

For purpose of personable [2] (B), the residence of a corporation or partiers to shall be deemed to be the place at which the principal exicutive rentice of the business is located, and the residence of a fur layer whose residence is without the United States shall be see ned 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 and it is valid notwithstanding any other provision of law requires of the form of 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
- Personal property purchased at retail
- t. Personal property purchased in casual sale
- 5. Personal property subjected to possessory lien
- Real property tax and special assessment liens
   Residential property subject to a inechanic's lien for certain repairs and improvements
- 8. Attorney's liens
- 9. Certain Insurance contracts
- 10. Passbook loans

(g) Refiling Of-Notice. — For purposes of this section -

- (1) General Rule. Unless notice of then is refilled in the manner prescribed in paragraph (2) during the required refuling period, such notice of then shall be treated as filled on the date on which it is filled (in accordance with subsection (1)) after the expiration of such refuling period.
- (2) Place For Filing. A notice of ken refiled during the required retiling 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 rear property, the fact of retilling is entered and recorded in an index to the extent required by subsection (f) (4), and
  - (B) in any case in which, 90 days or more prior to the date of a refiling of notice of lien under subgradiaph (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 filled in accordance with subsection (i) in the State in which such residence is located.

(3) Required Refiling Period, in the case of any notice of lies, 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 8 years after the close of the preceding required refiling period for such notice of lies.

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 iten imposed with respect to any internal revenue tax not later than 30 days after the day on which
- 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 anexamisin of fact time), and that is in accordance with such requirements in all to terms, conditions, and form of the bond and surrelies the sony as may be specified by such regulations.

Sec. 6103. Confidentiality and Disclosure of Seturns and Return Information.

- (x) Disclosure of Certain Returns and Return Information For Tax Administration Purposes.—
- (2) Disclosure of amount of outstanding fien, If a notice of fien has been filed pursuant to section 6323(f), the amount of the outstanding obligation secured by such lien may be disclosed to 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.