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Department of the Treasury Internal Revenue Service 1 2

Form 668 (Y)

(Flow January 1991)

# Notice of Federal Tax Lien Under Internal Revenue Laws

District Illinois	Serial Number 5071 99912	For Optional Use by Recording Office
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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.

91-199912

Name of Taxpayer **WILLIAMS**

Residence **124 W. ...**

**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)
1990	12/31/90	[REDACTED]	9/11/95	10/11/95	37556.60

COOK COUNTY CLERK'S OFFICE  
1991 SEP 26 AM 9:09

91499912

Place of Filing Recorder of Deeds Cook County Chicago, IL 60602	Total \$ 37556.60
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This notice was prepared and signed at Chicago, IL, on this, the 8th day of September, 1991.

Signature <i>[Signature]</i> Revenue Officer	Title Revenue Officer
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No. \_\_\_\_\_

United States

VS.

Notice of Tax Lien

Filed this \_\_\_\_\_

19 \_\_\_\_\_

at \_\_\_\_\_

m.

day of \_\_\_\_\_

Clerk (or Registrar).

Form 601 (Rev. 1-28-58) 00:55\$

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... Additional and delinquent taxes... together with any costs and charges... 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 provided by section 6321 shall continue until the assessment period is made, and shall continue until the liability for the amount so assessed is paid in full, or judgment against the taxpayer is paid out of such amount 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 lien imposed by section 6321 shall not be valid as against any purchaser in good faith of a motor vehicle, motor mechanic's lienor, or judgment lien creditor until notice thereof which meets the requirements of subsection (d) has been filed by the Secretary.

(c) 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 as here defined 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 any office within the State or the county or other governmental subdivision, as designated by the laws of such State, in which the person, subject to the lien is situated, except that State law otherwise conforming to relevant Federal law... (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 (A), 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, in the residence of the taxpayer at the time the notice of lien is filed. For purposes of paragraph (2)(B), the residence of a corporate or partnership shall be deemed to be the State at which the principal 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 such notice.

Note: See section 6322(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 in retail sale
4. Personal property purchased in retail sale
5. Personal property subject to customary lien
6. Real property tax and special assessment liens
7. Residential property subject to a mechanic's lien for certain repairs and improvements
8. Aircraft liens
9. Certain insurance contracts
10. Passbook loans

(d) Refiling Of Notice.—For purposes of this section:

(1) General Rule.—Unless notice of lien is refiled in the manner prescribed in paragraph (2) within the required refiling period, such notice of lien shall be treated as filed on the date on which it was filed in accordance with subsection (c) after the expiration of the refiling period.

(2) Place For Filing.—A notice of lien refiled during the required refiling period shall be effective only if:

- (A) In the case of real property, the office in which the principal office of the taxpayer was filed, and (ii) in the case of real property, and the fact of filing, recording, and recording is an index to the extent required by subsection (1)(4), and (B) in the case of personal property, the date of filing of notice of lien under subparagraph (A) the

Secretary has 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 (b) in the State in which such residence is located.

(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 10 years after the date of the assessment of the tax; and (B) the one year period ending with the expiration of 10 years after the date of the preceding required refiling 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 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 is in accordance with such regulations relating to terms, conditions, and form of the bond and notices thereon, as may be specified by such regulations.

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

(a) Disclosure of Certain Returns and Return Information For Tax Administration Purposes.—

(2) Disclosure of Amount of Outstanding Lien.—If a lien is in existence under laws relating 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 acquire a right in such property.