

# UNOFFICIAL COPY

Department of the Treasury - Internal Revenue Service

668 (Y)

## Notice of Federal Tax Lien Under Internal Revenue Laws

Serial Number 668132731	For Optional Use by Recording Office				
<p>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 the taxpayer for the amount of these taxes, and additional penalties, interest, and costs that may accrue.</p>					
Name of Taxpayer: COOK COUNTY CLERK'S OFFICE, A Corporation					
Address: 55 E. FAIRFIELD RD. MELVILLE, NY 11747-3020					
<p>IMPORTANT RELEASE INFORMATION: With respect to each assessment listed below, unless notice of release is filed by the date given in column (B), this notice will, on the day following such date, operate as a certificate of release as defined in IRC 6325(a).</p>					
Kind of Tax (A)	Tax Period Ended (C)	Identifying Number (D)	Date of Assessment (E)  COOK COUNTY CLERK'S OFFICE 1991 OCT 17 AM 9:14	Last Day for Refiling (B)	Unpaid Balance of Assessment (F)  81541314
\$41	03/31/91	48-2582820	07/15/91	09/28/01	\$104347.40
Place of Filing: Recorded at Deeds Cook County Illinois, U.S.A.				Total \$	\$104347.40

This notice was prepared and signed at CHICAGO, IL, on this,

the 17 day of September 91.

Signature: J. P. J. Pepe  
Title: Revenue Officer  
SSN: 56-01-3412

NOTE: Certificate of service authorized by law to take acknowledgments is not essential to the validity of Notice of Federal Tax Lien  
Rev. Rule 71-456, 1971-2 C.B. 606.

Form 668 (Y) (Rev. 1-91)

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## Notice of Tax Lien

United States

No. \_\_\_\_\_

vs.

Clerk (or Registrar)

Filed this \_\_\_\_\_  
19\_\_\_\_\_, at \_\_\_\_\_  
day of  
m.

### Excerpts From Internal Revenue Code

#### Sec. 6321. Lien For Taxes

If any person liable to pay any amount required to be paid by the due date (determined under section 6651(b) or 6654(b)) or by the date prescribed by regulation for payment of any tax, interest, or other amount required to be paid by such date, fails to pay such amount, there shall be levied and collected by the Secretary, notwithstanding any provision of law to the contrary, a lien for the amount so unpaid, and such amount, together with interest thereon, shall be held in trust by the Secretary for the payment of such tax, interest, or other amount.

#### Sec. 6322. Period Of Lien.

Unless otherwise provided by section 6321(b), law that is imposed by section 6321 shall arise in the case of the payment of a tax, interest, or other amount due on the date on which the amount is assessed as a lien prior against the right to receive any part of such tax, interest, or other amount, unless otherwise provided by section 6321.

#### Sec. 6323. Validity and Priority Against Certain Persons

(i) **Purchaser's, Holders Of Security Interests, Mechanic's Liens, And Judgment Lien Creditors.**—The lien imposed by section 6321 shall arise and be valid only with respect to the holder of a security interest, mechanic's lien, or judgment lien filed in the office where the notice referred to in subsection (ii) has been filed by the Secretary.

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

(A) **Place For Filing.**—The notice referred to in subsection (ii) shall be filed—  
(1) **Under State Law.**—In the case of real property, in one office within the State for the county or other governmental subdivision, as designated by law of such State, in which the property subject to the lien is situated; **provided that** State law does not conform to requiring a federal tax collector to file his notice in the office where the State for the county or other governmental subdivision, as designated by law of such State, in which the property subject to the lien is situated, **then that State law may be disregarded;** and

(2) **In the Office of the Clerk of the Court of Appeals of the United States or circuit court for the judicial district in which the property subject to the lien is situated; whenever the State has no title to the property, which meets the requirements of subparagraph (A); or**

(B) **Under Section 6323(i) Or Chapter 63 Of The District of Columbia.**—In the case of the Bureau of Internal Revenue 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;

(B) **Personal Property.**—In the case of personal property, whether tangible or intangible, at the residence of the taxpayer at the time of the assessment;

(C) **Business.**—In the case of (2), (B), the residence of a corporation, or the place deemed to be the place at which the principal office of the business is located, and the residence of a taxpayer whose regular abode is without the United States or the District of Columbia;

(D) **Form.**—The form and content of the notice referred to in subsection (ii) shall be accepted by the Secretary. Such notice shall be valid notwithstanding any other provision of law regarding the form or style of notice of lien.

**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. Money or value
- 3. Personal property purchased at retail
- 4. Personal property purchased in casual sale
- 5. Personal property subjected to possessory lien
- 6. Real property tax and special assessment liens
- 7. Residential property subject to a mechanic's lien for certain repairs and improvements
- 8. Attorney's liens
- 9. Certain insurance contracts
- 10. Past due loans

**Refiling Of Notice.**—For purposes of this section—

**General Rule.**—Unless notice of lien is refiled in accordance with paragraph (2) during the required refiling period, such notice of lien shall be treated as filed on the date of filing, and as filed in accordance with subsection (ii) after the expiration of such refiling period.

**(i) Place For Filing.**—A notice of lien refiled during the refiling period shall be effective only—

(A) **if—**

(1) **such notice of lien is filed in the office in which the prior notice of lien was filed; and**

(2) **in the case of real property, and the fact of filing is entered and recorded in an index to the property referred to in subsection (ii); and**

(B) **at any time in which 30 days or more prior to the date of filing 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, the notice of such lien is also filed in accordance with subsection (ii) in the State in which such residence is located.**

**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 close of the preceding required refiling period for such notice of lien.**

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

**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 requirements relating to terms, conditions, and form of the bond and all costs thereon, as may be specified by such regulations.

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

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

(1) **Disclosure of amount of outstanding lien.**—If notice of lien has been filed pursuant to section 6323(i), 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.