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Department of the Treasury - Internal Revenue Service

Form 668 (Y)

Rev. January 1993

Notice of Federal Tax Lien Under Internal Revenue Laws

District Chicago	Serial Number 100-100000000000000000	For Optional Use by Recording Office			
<p>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.</p> <p><i>921000238</i></p>					
Name of Taxpayer CRAVENICE ENTERPRISES					
Residence 59 WEST WASHINGTON SUITE 1000 • CHICAGO, IL 60602					
IMPORTANT RELEASE INFORMATION: With respect to each assessment listed below, unless notice of lien is refused by the date given in column (e), this notice shall, on the day following such refusal, 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)
46572	12/31/84	[REDACTED]	12/27/84	01/24/85	\$ 1,346,474.00
			12/27/84	01/24/85	
			12/27/84	01/24/85	
Place of Filing Cook County Circuit Court Court of Appeals Other (specify if applicable)				Total \$	1,346,474.00
Original Recording Date					

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

the 26th day of January, 1993.

Signature <i>S. Pepe</i>	Title CHIEF CLERK, I.R.S.
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(NOTE: Certificate of officer authorized by law to sign and stamp in official capacity. See Circular Letter 1000 for validity of Notice of Federal Tax Lien.)
Rev. Rule 71-406, 1971-2 C.B. 460

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United States

No.

vs.

Notice of Tax Lien

Filled this _____

, 19_____, at _____ m.

Clerk (or Registrar).

Excerpts From Internal Revenue Code

Sec. 6321. Lien For Taxes

If any tax, interest, or other amount payable under subtitle A or subtitle C is unpaid on the due date, or if any amount which, together with any interest, or other amount, is unpaid on the due date, is less than the balance of the unpaid taxes, interest, or other amounts, then there shall be created against such unpaid taxes, interest, or other amounts a lien for such unpaid taxes, interest, or other amounts.

Sec. 6322. Period Of Lien

Lien of section 6321, except as provided by section 6323(b), shall be created against any unpaid tax, interest, or other amount which, together with any interest, or other amount, is unpaid on the due date, or which, together with any interest, or other amount, is unpaid on or before the due date of payment of such tax, interest, or other amount.

Sec. 6323. Validity and Priority Against Certain Persons.

(a) Purchaser's, Holders Of Security Interests, Mechanic's Liens, And Judgment Lien Creditors.—If any tax, interest, or other amount payable under subtitle A or subtitle C is unpaid on the due date, or if any amount which, together with any interest, or other amount, is unpaid on the due date, or which, together with any interest, or other amount, is unpaid on or before the due date of payment of such tax, interest, or other amount, then there shall be created against such unpaid taxes, interest, or other amounts a lien for such unpaid taxes, interest, or other amounts.

(b) Place For Filing Notice; Form.—

(i) **Place For Filing.**—The place referred to in section 6321(b)(2)(A) is:

For personalty:

(A) If the property is in the case of the principal or officer of a corporation, against the corporation, or governmental authority, or corporation or governmental authority, in which the property was held at the time of filing.

(B) If personal property is in the case of a partnership, whether general or limited, or in the case of any other entity with more than one owner, against each such entity, but only to the extent of its share of the unpaid taxes, interest, or other amounts, except that State law may prohibit the filing of such notices, or notices of nonpayment, or notices of non-delivery, or notices of removal, with respect to property held in common with such entity.

(C) With respect to goods, fixtures, and equipment which are in the property under contract for sale, or for lease, to the State, or to any law enforcement agency, or any other entity or person, to whom the property is held under contract for sale, or for lease.

(D) With respect to goods, fixtures, and equipment which are in the property under contract for sale, or for lease, to the State, or to any law enforcement agency, or any other entity or person, to whom the property is held under contract for sale, or for lease, to whom the property is held under contract for sale, or for lease, or to whom the property is held under contract for lease, or to whom the property is held under contract for lease.

(ii) **Form.**—Subject to such regulations as the Secretary may prescribe, any notice of nonpayment of taxes, interest, or other amounts, shall be deemed to be satisfied if it contains a statement which specifies the amount of unpaid taxes, interest, or other amounts, and which states the name and address of the taxpayer, and which states the name and address of the place where the property is located.

Such form shall also state the name and address of the residence of any person whose unpaid taxes, interest, or other amounts are being collected by the Secretary.

Such notice shall also contain the name and address of the holder of a security interest, or the name and address of a judgment creditor, or the name and address of the mechanic, or of any other claimant, or the name and address of any other party to whom the property is being held.

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) Goods held by a processor, manufacturer, or distributor;
- (2) Goods for which a security interest has been created by the holder of such interest;
- (3) Goods for which a mechanic's lien has been created by the holder of such lien;
- (4) Goods for which a judgment has been entered in favor of the holder of such judgment;
- (5) Goods held under a consignment arrangement;
- (6) Goods held in a warehouse.

Refiling Of Notice.—For purposes of this section:

(a) General Rule.—In the case of a tax, interest, or other amount which is unpaid on the due date, or which is unpaid on or before the due date of payment of such tax, interest, or other amount, if a notice of nonpayment of such tax, interest, or other amount, is filed in accordance with section 6321, such notice may be refiled.

(b) Place For Filing.—A notice of nonpayment filed in accordance with section 6321(b)(1)(B) shall be effective only if:

(i) It is filed in the office or office in which the prior notice of nonpayment was filed; and

(ii) It states the same tax, interest, or other amount, the same place where the property is located, and the same date on which the notice of nonpayment was filed.

The notice of nonpayment may be filed in the office or office in which the property is located, or in the office or office in which the property was held at the time of filing the original notice of nonpayment, or in the office or office in which the property was held at the time of filing the original notice of nonpayment.

**\$8.00
FILING**

Secretary received written information (in the manner prescribed in regulations issued by the Secretary) concerning exchange in the taxpayer's residence, if a value of such items exceeded in accordance with subsection (d) in the State in which such residence is located.

(c) Required Refiling Period.—In the case of any notice of lien, the term "required refiling period" means:

(i) In the case of a tax, interest, or other amount which is unpaid on the due date, or which is unpaid on or before the due date of payment of such tax, interest, or other amount, the period of 30 days after the expiration of 2 years after the date of the assessment of the tax, or

(ii) In the case of a tax, interest, or other amount which is unpaid on the due date, or which is unpaid on or before the due date of payment of such tax, interest, or other amount, the period of 30 days after the expiration of 5 years after the date of the assessment of the tax.

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 interest in revenue for a tax later than 30 days after the expiration.

(b) Lien Fully Satisfied or Unenforceable.—The Secretary has, but the liability for the amount assessed, together with all interest and other charges thereon, has been fully satisfied or paid the 20th day of January, or:

(c) Bond Accepted.—There is furnished to the Secretary and accepted by him a bond that is conditioned upon payment of the amount assessed, together with all interest and other charges thereon, within the time prescribed by law (including any extension of such time), and that is in accordance with the requirements relating to form, conditions, and form of the bond and relates thereto, as may be directed by such regulations.

Sec. 6403. Confidentiality and Disclosure of Returns and Return Information.

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

(i) Disclosure of amount of outstanding benefit.—When a tax has been paid pursuant to section 6328(e), the amount of the outstanding benefit created by such tax may be disclosed to any person who furnishes satisfactory evidence that the tax right in the property subject to such tax or interests in certain rights in such property