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~~Department of the Treasury - Internal Revenue Service~~

Form 668 (Y)

Figures and Tables

Notice of Federal Tax Lien Under Internal Revenue Laws

DESIGN

Serial Number

For Optional Use by Recording Office

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.

9225.3.255

Name of Taxpayer

Residence

IMPORTANT RELEASE INFORMATION With respect to each assessment stated below, unless notice of release is reflected to the contrary, all rights in it are held by the Service. The right to release information under this notice shall be limited to the right to release such information under the authority defined in **IRC 6335(a)**.

Kind of Tax <i>(a)</i>	Tax Period Ended <i>(b)</i>	Identifying Number <i>(c)</i>	Date of Assessment <i>(d)</i>	Last Day for Refiling <i>(e)</i>	Unpaid Balance of Assessment <i>(f)</i>
12	1992		1992-09-10	1992-09-29	17,111.32
14	1992				1,119.15
			1992-09-10	1992-09-29	92284255

Place of Filing

Total \$ 1,395.00

This notice was prepared and signed at _____, on this,

the _____ day of _____, 19 ____.

Signature S. Fasone Title _____

NOTE: Certain amounts may be subject to audit by the Internal Revenue Service. Audit rights do not relate to the validity of Notice of Federal Tax Lien.

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

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No.

United States

vs.

Notice of Tax Lien

Filed this

19 _____, at _____ m.

Clerk (or Registrar).

FILED
\$8.00

Excerpts From Internal Revenue Code

Sec. 6321. Lien For Taxes

Any person liable for any tax imposed by law, the interest and additions resulting from such tax, and the amount of any deficiency in respect of such tax, together with any interest thereon, and all or any part of any amount paid, advanced, or otherwise applied by the United States toward satisfying any such debt, shall have a lien against such debt.

Sec. 6322. Period Of Lien.

Unless another date is specified in the notice, 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 asserted is discharged against the taxpayer, arising out of the tax so asserted or becomes unenforceable by reason of lapse of time.

Sec. 6323. Validity and Priority Against Certain Persons.

Purchaser's, Holders Of Security Interests, Mechanic's Liens, And Judgment Lien Creditors.—The lien imposed by section 6321 shall not prevail as against any purchaser of a security interest, mechanic's lien, or judgment lien creditor who has filed an affidavit in accordance with subsection (b) of section 6321.

Place For Filing Notice; Form.—

(1) Place For Filing.—The notice referred to in subsection (a) shall be filed:

(A) Under State Laws.

(B) Real Property.—In the case of real property, in one office within the State for 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:

(i) Personal Property.—In the case of personal property, whether tangible or intangible, in one office within the State for the county, or other governmental subdivision, as designated by the laws of such State, in which the property subject to the lien is situated, except that State law may conforming to existing Federal law establishing a national filing system does not constitute a second office for filing as designated by the laws of such State; or

(ii) 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 the 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 Or 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) Basis Of Property Subject To Lien.—For purposes of paragraphs (1) and (2), 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, in the residence of the taxpayer or in the place of the taxpayer or the place where the property is used;

(C) Goods.—In the case of goods, by the residence of a supplier of such goods, or by the place at which the principal office of the business is located, and the principal office of the business, when the business is without the United States, shall be deemed to be in the District of Columbia;

(D) Securities.—In the form and content of the notice referred to in subsection (a) as prescribed by the Secretary. Such notice shall be held to be sufficient if it contains provisions or a statement of the form or content of the 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
- 4. Personal property purchased in a sale
- 5. Personal property subjected to possession, lease, or rental
- 6. Real property tax and special assessment liens
- 7. Residential property subject to a mechanics' lien for certain repairs and improvements
- 8. Automobiles
- 9. Certain insurance contracts
- 10. Passbooks, safe-deposit boxes

Refiling Of Notice.—For purposes of this section:

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

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

(A) It is:

(i) Such notice of lien is filed in the office in which the prior notice of lien was filed; and

(ii) In the case of real property, and the fact of refiling is entered and recorded in an index to the extent required by subsection (b)(2); and

(B) In any case in which 90 days or more prior to the date of a refiling of notice of lien under subparagraph (A), the

Secretary receives written information in the manner prescribed in regulations issued by the Secretary concerning a change in the taxable residence of notice of such lien, is also filed in accordance with subsection (1) in the State in which such residence is located.

Required Refiling Period.—In the case of any notice of lien, the facts required refiling period is:

(A) At the one-year period ending 30 days after the expiration of 10 years after the date of the assessment of the tax; and

(B) At the one-year period ending in 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

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) A debt is 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 as the Secretary prescribes thereon, as may be specified by such regulations.

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

1. Disclosure of Certain Returns and Return Information For Tax Administration Purposes.—

(1) Disclosure of amount of outstanding lien.—If a notice of lien has been filed pursuant to section 6323(f), the amount of the outstanding obligation secured by such lien may be disclosed to any person who furnishes satisfactory evidence that he has a right in the property subject to such lien or intends to obtain a right in such property.