Department of the Treasury - Internal Revenue Service

(Rev. Sept. 1983)

Notice of Federal Tax Lien Under Internal Revenue Laws

District		Serial Number	Serial Number		For Optional Use by Recording Office	
As provided by sec that taxes (includin taxpayer. Demand Therefore, there is	g interest and pena for payment of the alien in favor of the axpayer for the amo	A 13- and 6323 of the Internal Revo- lities) have been assessed ag- his liability has been mad- ne United States on all prop- pount of these taxes, and add	enue Code, notice painst the following s, but it remains erty and rights to	g-named unpaid. property		
Name of taxpayer Pet Residence	er C Oertle	& D M Dettner				
	Box 2995 teline, Nv 89	0440				
IMPORTANT RELE	EASE INFORMAtice of lien is refit following such (a).	TION—With respect to led by the date given in date, operate as a cert	ificate of releas	se as de-		>
Kind of Tax	Tax Period Ended (b)	Identifying Number (c)	Date of Assessment (d)	Last Day for Refiling (e)	Unpaid Balance of Assessment (f)	
1040	12-31-81	-8814	05-24-82	06-23-88	2,417.69	
					en e	
	as County Rec n, Nevada	corder 4347		Total	\$ 2,417.69	
This notice was prepared	d and signed at	Reno, Nevada		RETUI INTER SPECI	RN TO: NAL REVENUE SERVICE	on this.
the 14 day of	May	, 1984		P. O. I. RENO,	NAL REVENUE SERVICE - L. PROCEDURES FUNCTION ON 4200 NV 89505	INT
Signature & Ma	Ga TI	P11c- C-14-	Title	0-5	BOOK 584 PAGE	038

NOTE: Certificate of officer authorized by law to take acknowledgements is not essential to the validity of Notice of Federal 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 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 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 taxpayer 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) Purchasers, Holders Of Security Interests, Mechanic's Lieners, And Judgment Lien Creditors.—The lien imposed by section 6321 shall not be valid as against any purchaser, holder of a security interest, mechanic's lienor, or judgment lien creditor until notice thereof which meets the requirements of subsection (i) has been filed by the Secretary.
- (b) Protection For Certain Interests Even Though Notice Filed, - Even though notice of a lien imposed by section 6321 has been filed, such lien shall not be valid-

(I) 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, 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 lien is situated; or

(B) With Clerk Of District Court in the office of the clerk of the United States district court for the judical district in which the property subject to the line stunted, whenever the scalethas not by law designated one office which meets the requirements of subparagraph (A), or

(C) With Recorder OI 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

(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, at the residence of the taxpayer at the time the notice of lien is filed, For purposes of paragraph (2)(8), the residence of a corporation or partnership shall be deemed to be the place at which the principal executive 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

(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 a notice of lien.

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

(1) General Rule.—Unless notice of lien is refiled 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 (I)) after the expiration of such retiling period.

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

(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 real property, the fact of refiling is entered and recorded in an index to the extent required by subsection (i) (4), and

(B) In any case in which 90 days or more prior to the date of a reliling of notice of lien under subparagraph (A), the Secretary received written information (in the manner prescribed in regulations issued by the Section of the Indian of the Indian of the Indian of the Indian of prescribed in regulations issued by the Secretary) concern-

(3) Required Rolling Period. -- In the case of any notice of lien, the term "required reliting 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 6 years after the close of the preceding required reliting 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

(1) Liability Satisfied or Unenforceable.—The Secretary finds that the liability for the amount assessed, together with all interest in respect thereol, 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 surelies thereon, as may be specified by such regulations.

Sec. 6103. Confidentiality and disclosure of returns and return information.

(k) Disclosure of Cortain Returns and Return Information For Tax Administration Purposes.-

(2) 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 written Providence 194 in the property subject to such lien or intends to obtain a right in such property.

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RECORDER

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