Form 668

Department of the Treasury - Internal Revenue Service

(Rev. Sept. 1983)	Notice of Federal Tax Lien Under Internal Revenue Laws					
District	Serial Number				For Optional Use by Recording Office	
1	Reno, Nevada	1				
that taxes (includir taxpayer. Demand Therefore, there is	ng interest and penal I for payment of the a lien in favor of the axpayer for the amo	nd 6323 of the Internal Reve ties) have been assessed ag is liability has been made e United States on all prope ount of these taxes, and add	painst the following e, but it remains erty and rights to p	named unpaid. roperty		
Name of taxpayer						
	ODI ANDO	N MPOTTO				
ORLANDO N. TROLIO Residence PO Box 54					\ \	
Zephyr Cove, Nevada 89448					\ \	
l below, unless not	ice of lien is refil following such o	FION-With respect to ed by the date given in date, operate as a cert	า column (e), th	is notice		
Kind of Tax (a)	Tax Period Ended (b)	ldentifying Number (c)	Date of Assessment (d)	Last Day for Refiling (e)	Unpaid Balance of Assessment (/)	
1040	12-31-77	-4441	12-29-80	02-28-86	\$ 7,212.34	
1040	12-31-78	-4441	02-09-81	03-11-87	\$14,868.47	
Place of filing	Recorder 4	247	/ /			
Dougla	s County Nevada 89))	Total	\$ 22.080.81	
his notice was prepare	d and signed at	Reno, Neva	ıda	RETUI INTER SORGE	RN TO: NAL REVENUE SERVICE on thi POR 4000 See 1820	
				F. C. 7	4200 CRES FUNCTION	
he 26 day of _	October	, 19 <u>84</u>			★ 6 89305	
Signature //	7 / 2	(10)	Title			

William Bierce

Revenue Officer

Tax Lieu Rev. Rul. 71-466, 1971-2 C.B. 409.)

Revenue Officer

109354

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Form 668 (Rev. 9.83)

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 fiability) is satisfied or becomes unenforceable by reason

Sec. 6323. Validity and Priority Against Certain Persons.

- (a) Purchasers, 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, holder of a security interest. nechanic'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—

 (1) Place For Filing Notice: Form.—

 (1) Place For Filing.—The notice referred to in subsection (a) shall be filed—
- (A) Under State Laws -
 - (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 proper-
- ty, 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

48) Verth Clerk Of District Court in the office of the circle of the United States district court for the judicial district in which the property subject to the lien is studied whenever the State has not by law designated one office which injects the requirements of sub-paragraph (7) or

- (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 (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
- (b) Personal Property—In the case of personal property, whether tangible or intangible, at the residence of the Taypayer at the time the notice of lien is filed. For purposes of paragraph (2)(B), 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 (f)) after the expiration of such refiling period.

 (2) Place For Filling.—A notice of lien refiled during the required refiling period shall be effective only—
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 (a) such notice of ben is relided in the office in
 which the prior notice of len was filed, and
 (b) in the case of real property, the fact of relif-ns is entered and recorded in an index to the extent required by subsection (f) (4), and
- (B) In any case in which 90 days or more prior to the date of a retiling 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, if a notice of such then is also filed in accordance with subsection (1) in the State in which such residence is located. IN OFF

(3) Required Refiling Period.—In the case of any notice of hen, the term "required refiling 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 tien.

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 thereof, has been fully satisfied or has
- (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 sureties thereon, as may be specified by such regulations

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

- (k) Disclosure of Certain Returns and Return Information For Tax Administration Purposes.-
- (2) Disclosure of amount of outstanding ken -11 a of lien has been filed pursuant to section 6323(1), 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 evidence that he has a right in the property sub-lien or intends to obtain a right in such property REGUESTED BY

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