Form 668	Department of the Treasury - Internal Revenue Service							
(Rev. Sept. 1983)	Notic	ce of Federal Tax L	ien Under l	nternal Reve	nue La	WS		
District	<u> </u>	Serial Number	Serial Number			For Optional Use by Recording Office		
that taxes (including taxpayer. Demand Therefore, there is	ctions 6321, 6322, and interest and penal for payment of the allen in favor of the axpayer for the amo	id 6323 of the Internal Reverties) have been assessed agains liability has been made united States on all properunt of these taxes, and additional states of these taxes.	ainst the following , but it remains rty and rights to p	i-named unpaid. property	<	\		
Name of taxpayer Bruce A. Seymour Residence								
111 Lake Shore Court Zephyr Cove, NV 89448						7 /		
IMPORTANT: RELI below, unless not shall, on the day fined in IRC 6325 (EASE INFORMATice of lien is refile following such days.	TION-With respect to e ed by the date given in late, operate as a certif	each assessme column (e), th ficate of releas	ent listed is notice se as de-				
Kind of Tax	Tax Period Ended (b)	Identifying Number (c)	Date of Assessment	Last Day for Refiling (e)		Unpaid Balance of Assessment (f)	>	
941	9/30/80	-5467N	9/12/83	10/12/89		3,929.15		
Place of filling						-		
/ /	las County			Total	\$	3,929.15		
This notice was prepare the <u>26th</u> day of _	November	San Rafael, CA , 19_84		RETURN TO: INTERNATION SECTION	The second	PRVICE , , o	n this,	
Signature N. Y	ee Myke	Title Revenue Officer						

(NOTE: Certificate of officer authorized by law to take acknowledgements is not essential to the validity of Notice of Federal Tax Lien Rev. Rul. 71-466, 1971-2 C.B. 409.)

Excerpts From Internal Revenue Code

568 (Rev.

9.83

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 assess. We 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

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 Lienors, 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 thereol which meets the requirements of subsection (1) has been filed by the Secretary.
- (b) Protection For Certain Interests Even Though Notice Filed.—Even though notice of a lien imposed by sec-tion 6321 has been filed, such lien shall not be valid—
- on 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 subection (a) shall be filed—

 (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 filen 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 filen is situated; or

 (8) Wan Clock Of District Court. In the office of the
- (B) Wan Clerk Of District Court. In the office of the clerk of the United States district court for the publical district in which the property subject to the len is situated, whenever the State has not by law designated care office which meets the requirements of subparagraph (A), er

(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

Notice of Tax Li

- of paragraphs (1) and (4), property shall be deemed to be situated—
- aitualcd—

 (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)(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 " taxpayer whose residence is without the United States shall be deemed to be in the District of Columbia.
- (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 ben.
 - (g) Religing Of Notice.—For purpose of this section-
- (1) General Rule.—Unless notice of lien is reliked in the manner prescribed in paragraph (2) during the required reliling period, such notice of lien shall be treated as filed on the date on which it is filed (in accordance with subsection (1)) after the expiration of such reliling period.

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

- (A) if
 (b) such notice of fen is refiled in the office in which the prior notice of fen was filed, and
 (a) is the case of real property, the fact of refil ing 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 reliting 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 laxpayer's residence, if a notice of such lien is also filed in accordance with subsection (f) in the State in which such residence is located.

- (3) Required Refitting Period.—In the case of any notice of lien, the term "required refitting period" means—
 (A) the one-year period ending 30 days after the expiration of 6 years after the date of the assessment of the
- (B) the one-year period ending with the expiration of 6-years after the close of the preceding required rehling 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 thereof, has been fully satisfied or has
- all interest in respect thereof, has been fully satisfied of 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 appointed by such regulations. specified by such regulations.
- Sec. 6103. Confidentiality and disclosure of returns and return information.
- (k) Disclesure of Certain Returns and Return Information For Tax Administration Purposes .-
- (2) Disclesure of amount of outstanding fien —If a notice 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 lien or intends to obtain a right in such property.

REQUESTED BY IN OFFICIAL FCO 25 OF

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