Form 668 (Y)
(Rev. 7-89)

128

Department of the Treasury - Internal Revenue Service

Notice of Federal Tax Lien Under Internal Revenue Laws

District	Serial Number	For Optional Use by Recording Office
Des Moines, IA	429161809	

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.

Name of Taxpayer PAUL H & VICKY J GATES

Residence BOX 55A
EARLVILLE, IA 52041-0055

IMPORTANT RELEASE INFORMATION: With respect to each assessment listed below, unless notice of lien is refiled by the date given in column (e), this notice shall, on the day following such date, 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)
1040	12/31/84	[redacted]-4936	09/01/88	10/01/98	11416.34
1040	12/31/88	[redacted]-4936	06/26/89	07/26/99	494.56
1040	12/31/89	[redacted]-4936	05/28/90	06/27/00	3275.26
				Total	$ 15186.16

Place of Filing
Delaware County Recorder
Delaware Courthouse
Manchester, IA 52057

This notice was prepared and signed at Des Moines, IA, on this,

the 18th day of January, 19 91.

Signature P.E. Miller
Chief, SPS
for F. Kahler

Title Advisor, S.P.F.
42-01-6902

FILE No. 69-1702
RECORDING FEE $ 5.00
TRANSFER FEE $

FILED FOR RECORD THE 29 DAY OF January 19 91 AT 10:11 O'CLOCK A. M. BOOK I12 PAGE 107

STATE OF IOWA, DELAWARE COUNTY
Joan Sheppard, Recorder
LM

IRS (chg)

Form 668 (Y) (Rev. 7-89)

69-1702

DELAWARE COUNTY IOWA
FILED
'91 JAN 29 AM 10 11
BOOK 112 PAGE 107
RECORDER
$5.00

Clerk (or Registrar).

Filed this ____ day of

19 ____, at ____ m.

Notice of Tax Lien

No. 69-1702

United States

vs.

PAUL H. GATES, ETAL

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) **Purchaser's, 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 thereof which meets the requirements of subsection (f) has been filed by the Secretary.

(f) **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 judicial district in which the property subject to 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 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 situated -

(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 a 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 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 casual sale
5. Personal property subjected to possessory lien
6. Real property tax and special assessment liens
7. Residential property subject to a mechanic's lien for certain repairs and improvements
8. Attorney's liens
9. Certain insurance contracts
10. Passbook loans

(g) **Refiling Of Notice.** — For purposes 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 Filing.**—A notice of lien refiled during the required refiling period shall be effective only -

(A) if-

(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 (f) (4), 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 received written information (in the manner pre scribed in regulations issued by the Secretary) concernin a change in the taxpayer's residence, if a notice of such lie is also filed in accordance with subsection (f) in the Stat in which such residence is located.

(3) **Required Refiling Period.**—In the cas of any notice of lien, the term "required refiling period" means

(A) the one-year period ending 30 days after the expiratio of 6 years after the date of the assessment of the tax, an

(B) the one-year period ending with the expiration of years after the close of the preceding required refiling perio for such notice of lien.

Sec. 6325. Release Of Lien O Discharge Of Property

(a) **Release Of Lien.** — Subject to such regula tions as the Secretary may prescribe, the Secretary shall issu a certificate of release of any lien imposed with respect to an internal revenue tax not later than 30 days after the day o which -

(1) Liability Satisfied or Unenforceable - The Secretary find that the liability for the amount assessed, together with all in terest in respect thereof, has been fully satisfied or has becom legally unenforceable; or

(2) Bond Accepted-There is furnished to the Secretary an accepted by him a bond that is conditioned upon the paymer of the amount assessed, together with all interest in respec thereof, within the time prescribed by law (including any exten sion of such time), and that is in accordance with such require ments relating to terms, conditions, and form of the bond an 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 lien.-If a notice o lien has been filed pursuant to section 6323(f), the amount o the outstanding obligation secured by such lien may be disclose to any person who furnishes satisfactory written evidence tha he has a right in the property subject to such lien or intends t obtain a right in such property.