ID: CCA 2017060714192296

UILC: 7701.20-00

Number: **201739011** Release Date: 9/29/2017

From:

Sent: Wednesday, June 07, 2017 2:19:22 PM

To: Cc:

Bcc:

Subject: Request for Technical Assistance: POSTS-117911-12

On 2/14/2017, you submitted a request for technical assistance that asked whether the federal tax lien for the assessment of a FICA tax liability incurred by (an

unincorporated division of) attaches

to the assets of when

charter specifically empowers

to create for the

purpose of legally segregating the assets and liabilities of discrete business endeavors of regardless of common directorship.

Based upon the facts as presented in your request, the notices of federal tax lien filed against are proper. Additionally, the notices of federal tax lien filed against are proper.