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From:

Sent: Monday, February 09, 2009 3:47:30 PM

To:

Cc:

Subject: RE:

Hi I don't know whether I have it, but the advice now is to demand liquidation of mutual funds only because they are redeemable directly from the issuer and do not have to be sold to liquidate. If the account contains stock, the IRS is required to follow the traditional line of seizing the certificates. If no certificates are available, the revenue officer should request that the broker ask the corporation to issue certificates; if the corporation no longer issues certificates, the revenue officer must seize and sell the brokerage account (or so much of the account necessary to pay off the liability). I hope that helps.