

**The Florida Senate**  
**BILL ANALYSIS AND FISCAL IMPACT STATEMENT**

(This document is based on the provisions contained in the legislation as of the latest date listed below.)

Prepared By: The Professional Staff of the Community Affairs Committee

BILL: CS/SB 2190

INTRODUCER: Community Affairs Committee and Senator Altman

SUBJECT: Tax Collections, Sales, and Liens

DATE: April 6, 2009 REVISED: \_\_\_\_\_

	ANALYST	STAFF DIRECTOR	REFERENCE	ACTION
1.	Molloy	Yeatman	CA	Fav/CS
2.			FT	
3.			WPSC	
4.				
5.				
6.				

**Please see Section VIII. for Additional Information:**

- |                              |                                     |                                         |
|------------------------------|-------------------------------------|-----------------------------------------|
| A. COMMITTEE SUBSTITUTE..... | <input checked="" type="checkbox"/> | Statement of Substantial Changes        |
| B. AMENDMENTS.....           | <input type="checkbox"/>            | Technical amendments were recommended   |
|                              | <input type="checkbox"/>            | Amendments were recommended             |
|                              | <input type="checkbox"/>            | Significant amendments were recommended |

**I. Summary:**

The CS/SB 2190 (the bill) revises, updates, and consolidates provisions of chapter 197, of the Florida Statutes, relating to tax collections, tax sales, and liens. The bill authorizes tax collectors to issue certificates of correction to the tax rolls and outstanding delinquent taxes for uncollectible personal property accounts; and consolidates provisions relating to the payment of deferred taxes on real property, homestead property, affordable rental property, and recreational and commercial working waterfront property. The bill provides authorization for and requirements for the purchase of county-held tax certificates, and provides fees for electronic services.

The bill substantially amends chapter 197 of the Florida Statutes.

**II. Present Situation:**

Chapter 197, Florida Statutes, governs tax collections, sales and liens. The chapter provides statutory requirements relating to the deferral of ad valorem taxes and non-ad valorem assessments for homestead property, for recreational and commercial working waterfronts, and for affordable housing rental property. Requirements for the prepayment of estimated taxes by

the installment method are provided, as are requirements relating to the notice and collection of ad valorem taxes, taxes, non-ad valorem assessments, and delinquent taxes or assessments. The method for tax collectors to provide for the sale and purchase of tax certificates and the redemption requirements for those certificates are established, as are requirements governing the application for and issuance of tax deeds on property for which certificates are not redeemed, and the sale at public auction of property for which taxes are delinquent.

Chapter 197 also contains notice requirements relating to the publication of the certified tax roll, notice to taxpayers of taxes due and delinquent taxes payable, the advertising of real or personal property with delinquent taxes, and requirements which govern the seizure of personal property on which taxes are delinquent. In addition to provisions governing the duties and responsibilities of tax collectors, chapter 197 also provides duties and responsibilities of the Department of Revenue.

### **III. Effect of Proposed Changes:**

**Section 1.** Amends s. 197.102, F.S., to provide the following definitions:

- “Awarded” means the time when the tax collector or a designee determines and announces verbally or through the closing of the bid process in an electronic auction that a buyer has placed the winning bid at a tax certificate sale.
- “Proxy bidding” means a method of bidding by which a bidder authorizes an agent, either electronically or in person, to place bids on the bidder’s behalf.
- “Random number generator” is a computation device that generates a numerical sequence without a pattern which is used to resolve a tie when multiple bidders have made the same low bid. The generator assigned a number to each one of the tied bids and randomly determines which is the winning bid.
- Revises the definition of “tax certificate” and “tax notice” to include an electronic tax certificate and an electronic tax bill.

**Section 2.** Amends s. 197.122, F.S., to clarify that an act of omission or commission by the property appraiser, the tax collector, the board of county commissioners, the clerk of the circuit court, the county comptroller, or any of their deputies or assistants, or an act of omission or commission by a newspaper in which an advertisement of tax sale may be published, does not defeat the payment of taxes. Provides that taxes include interest, fees, and costs due. Requires the tax collector to correct material mistakes of factor rather than leaving it to the property appraiser’s discretion. Clarifies that when real property being sold for nonpayment of taxes is redeemed before the clerk of the court receives full payment for a tax deed, including all recording fees and documentary stamps, the sale or conveyance of such property is not valid. Makes additional technical revisions.

**Section 3.** Amends s. 197.123, F.S., to clarify that the tax collector must notify the property appraiser if a taxpayer has filed an erroneous or incomplete personal property statement or has not disclosed all of the property subject to taxation.

**Section 4.** Creates s. 197.146, F.S., to provide that a tax collector who determines a tangible personal property account is not collectible may issue a certificate of correction for the tax roll and any outstanding delinquent taxes. The tax collector must notify the property appraiser that

the account is invalid, and the assessment may not be certified forward. Uncollectible amounts include, but are not limited to, an account originally assessed but which cannot be found to seize and sell for the payment of taxes, and other personal property of the owner for which a tax warrant may be levied.

**Section 5.** Amends s. 197.162, F.S., to make technical corrections.

**Section 6.** Amends s. 197.172, F.S., to delete outdated language, and to clarify that interest on tax certificates shall be calculated from the first day of the month, including interest on deferred payment tax certificates which is currently calculated as provided in s. 197.262, F.S.

**Section 7.** Amends s. 197.182, F.S., to clarify circumstances under which the Department of Revenue apportions the prorated share due from each taxing authority when taxes are overpaid. The minimum amount of a refund for a taxpayer overpayment is raised from \$5 to \$10, and if the error is determined within 24 months, the overpayment shall be automatically refunded to the taxpayer. When a payment by a taxpayer has been made in error due to misapplication of the payment by the tax collector or misinformation provided by a property appraiser, the refund must be made within 12 months, rather than 24 months. However, a taxpayer has 4 years from January 1 of the year in which taxes were paid to file a refund claim for overpayment. Raises from \$400 to \$2,500, the amount of a refund that does not have to be forwarded to the Department of Revenue for refunds ordered by the department.

**Section 8.** Amends s. 197.222, F.S., to remove requirements that the application for prepayment of estimated taxes by the installment methods be made on forms supplied by the Department of Revenue. Provides that the tax collector may send a quarterly statement with the discount rates by mail, or electronically, and the cost of electronic mailing is to be paid out of the county's general fund.

**Section 9.** Amends s. 197.2301, F.S., to clarify provisions relating to procedures for payment of taxes prior to certification of the tax roll. Authorizes each tax collector to bill for underpayments of \$10 or less. Overpayments of more than \$10 shall be immediately refunded to the person making the overpayment. (Current law provides that no billing or refund is required when underpayment or overpayment is \$5 or less.)

**Section 10.** Creates s. 197.2421, F.S., to combine all ad valorem tax deferrals and non-ad valorem assessments into one section. Clarifies that authorized property tax deferral programs are:

- Homestead tax deferral.
- Recreational and commercial working waterfront tax deferral.
- Affordable rental housing deferral.

Clarifies that deferred taxes and non-ad valorem assessments constitute a prior lien and attach to the property in the same manner as other liens.

**Section 11.** Creates s. 197.2423, F.S., to consolidate the application process for tax and assessment deferrals.

**Section 12.** Creates s. 197.2425, F.S., to consolidate the appeals process for denial of an application for deferred ad valorem taxes and non-ad valorem assessments. Extends the time a petitioner may file with the value adjustment board from 20 days to 30 days after receipt of notice of disapproval. Value board adjustment denials may be appealed in the same manner as provided in current law.

**Section 13.** Amends s. 197.243, F.S., to remove “act” from the title of the section.

**Section 14.** Amends s. 197.252, F.S., to remove authorization for a person to elect to defer the payment of taxes and non-ad valorem assessments on property which would be covered by a tax certificate levied on the person’s homestead property, and instead provides for a deferral of taxes on homestead property for persons who make application and meet the statutory requirements.

Removes requirements relating to the interest that accrues on deferred payment tax certificates and providing that the interest accrued may not exceed 7 percent as these requirements are addressed in a later section of the bill.

**Section 15.** Renumbers s. 197.303, F.S., as s. 197.2524, F.S., to incorporate tax deferrals for recreational and commercial working waterfronts as well as affordable rental housing property into one section. Makes additional technical revisions.

**Section 16.** Renumbers s. 197.3071, F.S., as 197.2526, F.S., and no substantive changes are made to affordable rental housing property eligibility requirements.

**Section 17.** Amends s. 197.254, F.S., relating to annual notification to taxpayer payers of the right to defer payment of ad valorem taxes and non-ad valorem assessments, to remove requirements that such notification be printed on the back of envelopes used for mailing to each taxpayer the notice of current taxes as required under s. 197.322(3), F.S.

**Section 18.** Amends s. 197.262, F.S., to strike provision requiring the tax collector to notify each local governing body of the amount of ad valorem taxes and non-ad valorem assessment deferred which would otherwise have been collected for such governing body. Clarifies that tax certificates on which there are deferred taxes to the county may not be sold to the public, and reduces the interest rate on such certificates from 9.5 percent to 7 percent.

**Section 19.** Amends s. 197.263, F.S., to incorporate requirements relating to change of use or change of ownership for tax-deferred property into one subsection.

**Section 20.** Amends s. 197.272, F.S., to remove restrictions on who may pay deferred taxes, to allow anyone to make the payment. Provisions requiring that partial payments are first applied to accrued interest are deleted. Any partial payment may not apply to a portion of a full year’s deferred taxes, assessments, and interest.

**Section 21.** Amends s. 197.282, F.S., to make technical corrections.

**Section 22.** Amends s. 197.292, F.S., to make technical revisions.

**Section 23.** Amends s. 197.301, F.S., to revise penalties assessed for willful filing of false information relating to a tax deferral on homestead property or requirements relating to change of use or ownership on tax. Current law requires payment of the total amount of taxes and interest deferred, and a penalty of 25 percent of such payment. The new provision requires payment of the total amount of deferred taxes, non-ad valorem assessments, and interest on both, and a penalty of 25 percent of such payment.

**Section 24.** Amends s. 197.312, F.S., to make technical revisions.

**Section 25.** Amends s. 197.322, F.S., to provide that the tax collector may send the notice of taxes due, including delinquent taxes outstanding, to a taxpayer either electronically or by postal mail. Electronic transmission may only be used with the express consent of the property owner. Electronic notices may be sent earlier but not later than a postal mailing. If the electronic notice is returned as undeliverable, a second notice may be sent by postal mail but the original electronic notice is the official notice under this section, and no discount period can be extended due to the return of a tax bill either electronically or through the postal mail. In addition to the cost of postal mailing, the cost of electronic mailing must be paid out of the county's general fund.

**Section 26.** Amends s. 197.332, F.S., to authorize tax collectors to perform duties related to the collection of taxes on the tax roll by the date of delinquency or to collect delinquent taxes, interest, and costs by sale of tax certificates on real property and by seizure and sale of personal property by the use of contracted services or products, or by electronic means, but the use of such services and means may not diminish the responsibility or liability of the tax collector to perform such duties according to law.

Authorizes tax collectors to establish one or more branch office by acquiring title to real property or by lease agreement, and authorizes the tax collector to staff and equip such branch offices, subject to approval of budget by the Department of Revenue, and to perform state duties on behalf of the department and as an agent of the Department of Highway Safety and Motor Vehicles. Clarifies that county business may be conducted at such office upon resolution of the county governing board.

**Section 27.** Amends s. 197.343, F.S., to provide for additional tax notices to be sent electronically, as well as by postal mail, by April 30 to each taxpayer whose tax payment has not been received. Electronic transmission may only be used with the express consent of the property owner. If the electronic notice is returned as undeliverable, a second notice may be sent by postal mail but the original electronic notice is the official notice under this section. Provisions for a duplicate tax notice to be sent to a condominium or to a mobile home owner's homeowners' association are removed. Provisions for a notice of delinquency for taxes on subsurface rights to be sent by mail to the owner of the fee title are removed.

**Section 28.** Amends s. 197.344, F.S., to provide that tax notices sent to a third party as designated by a taxpayer, or tax notices sent to a mortgagee who is a trustee of an escrow account for ad valorem taxes on the property and tax notices sent to the owner of such property, or tax notices sent to a vendee of an unrecorded or recorded contract for deed, may be sent electronically or by postal mail. Electronic transmission may only be used with the express

consent of the person making the request. If the electronic notice is returned as undeliverable, a second notice may be sent by postal mail but the original electronic notice is the official notice under this section. Additional technical revisions are made.

**Section 29.** Amends s. 197.3635, F.S., to provide that the “Notice of Ad Valorem Taxes and Non-ad Valorem Assessments” does not have to provide a clear partition between taxes and assessments or meet size requirements for such partition.

**Section 30.** Amends s. 197.373, F.S., to provide that requests for partial payment of delinquent taxes must be made 45 days prior to the tax certificate sale rather than 15 days prior as provided in current law.

**Section 31.** Amends s. 197.402, F.S., to clarify that if the advertising deadline for tax certificates falls on a Saturday, Sunday, or legal holiday, it is extended to the next working day.

**Section 32.** Amends s. 197.403, F.S., to eliminate the requirement that a publisher’s proof of publication for a notice of tax sale be made on a form prescribed by the Department of Revenue.

**Section 33.** Amends s. 197.413, F.S., to make technical revisions and to provide that the notice provided by the clerk of the court to each taxpayer who is delinquent on the payment of personal property taxes informing the taxpayer of the tax collector’s intent to seize such personal property may be provided by the tax collector at the clerk’s request. The tax collector’s fee for collection of delinquent taxes is raised from \$2 to \$10.

**Section 34.** Amends s. 197.414, F.S., to provide that the warrant register for warrants and levies on tangible personal property may be maintained in paper or electronic form, and eliminates a requirement that the form of the tax warrant register be prescribed by the Department of Revenue.

**Section 35.** Amends s. 197.4155, F.S., to remove a requirement that if an installment payment program is implemented by a tax collector for the payment of delinquent personal property taxes, the installment provided must be available to taxpayers with a delinquency in excess of \$1,000. Provides additional technical revisions.

**Section 36.** Amends s. 197.416, F.S., to make technical revisions.

**Section 37.** Amends s. 197.417, F.S., to remove the 15-day notice requirement for the public notice by advertisement of the sale of seized personal property. Provides that such notice must be posted in at least two places in the county rather than three places, and removes the requirement that one of the places must be the courthouse. Provides that Internet notice qualifies as one location. Provides that when a sale is conducted electronically, a description of the property and a photograph, when practical, must be available. The requirement for immediate payment is removed.

**Section 38.** Amends s. 197.432, F.S., to provide that the tax collector may conduct the sale of tax certificates for unpaid taxes by electronic means which must comply with the provisions of

chapter 197, F.S. A tax collector who chooses to conduct electronic sales may receive electronic deposits and payments related to the tax certificate sale.

Provides that delinquent taxes on real property may be paid after the date of delinquency by paying the tax and all interest, costs, and charges, but payment must be completed before a tax certificate is awarded to a buyer or struck to the county at a tax certificate sale. Any tax certificate available for sale on land which is, prior to the time of sale, the subject of a tax deed application filed by the county shall be struck to the county.

Provides that proxy bidding is valid when authorized or accepted by the potential buyer of a tax certificate. Authorizes the tax collector to determine the method of selecting the bidder to whom a certificate will be awarded when multiple bidders offer the same lowest rate of interest. Provides that the use of a random number generator, or selection of the first bid received, are acceptable methods for selecting a winning bidder.

Deletes requirements that the form of a tax sale certificate be prescribed by the Department of Revenue. The minimum amount of a tax certificate on homestead property is raised from \$100 to \$250.

Authorizes the tax collector to provide written or electronic notice when tax certificates are ready to be issued, and clarifies that payment must be made within 48 hours after the transmission of the electronic notice by the tax collector or receipt of the written notice by the certificate buyer. If the tax collector discovers that payment has been made in error, a refund must be issued within 15 business days.

**Section 39.** Amends s. 197.4325, F.S., to make technical revisions to provisions governing procedures when the payment of taxes or tax certificates is dishonored. Requirements that the tax collector retain copies of a canceled tax receipt and a dishonored check are deleted.

Repeals requirements that the Department of Revenue approve the cancellation and resale of certificates delivered to a bidder whose payment has been dishonored.

**Section 40.** Amends s. 197.442, F.S., to make technical revisions.

**Section 41.** Amends s. 197.443, F.S., to make technical revisions. Provides that technical corrections or cancellations that have been ordered by a court, or that do not result from changes made in the assessed value on a tax roll certified to the tax collector, shall be made by the tax collector without order from the Department of Revenue.

**Section 42.** Amends s. 197.462, F.S., to repeal requirements that the official endorsement of a tax certificate by the tax collector is sufficient evidence of the assignment of the certificate to simplify the transfer of certificates from one holder to another.

**Section 43.** Amends s. 197.472, F.S., to remove the authority of persons to purchase a county-held tax certificate (being relocated to a new section), and to provide that when redeeming a certificate, payment includes the face amount of the certificate and all interest, costs, and

charges. Redemption shall be made proportionately when only a portion of a certificate is being redeemed.

Provides that when a tax certificate has been redeemed, the tax collector must submit payment to the owner of the certificate within 15 business days of receipt of the amount of redemption or pay interest at the rate of 5 percent.

**Section 44.** Creates s. 197.4725, F.S., to provide for the purchase of county-held tax certificates.

- Any person may purchase a county-held tax certificate at any time after the certificate is issued and before a tax deed application is made. The purchaser must pay the face amount of the certificate plus all interest, costs, and charges, or a portion thereof, when a portion is being purchased.
- Interest is calculated at 1.5 percent per month, or a fraction thereof, to the date of purchase.
- The tax collector may receive \$6.25 for each county-held tax certificate purchased.
- Collections on timeshare property are excluded.
- The tax collector may use electronic means to notice that county-held tax certificates are available for purchase and to complete the purchase. Reasonable fees may be charged.
- The purchaser of a county-held tax certificate shall be issued a new tax certificate with a face value that includes all sums paid to acquire the certificate from the county, including accrued interest and charges paid pursuant to this section. The date the county-held certificate was issued shall be the date used to determine the date on which application for tax deed may be made.

**Section 45.** Amends s. 197.473, F.S., to delete requirements that unclaimed tax certificate redemption monies are remitted to the board of county commissioners, and provides that such monies and unclaimed redemption monies for tax deeds are considered as unclaimed funds and shall be remitted to the state as provided in s. 717.117, F.S.

**Section 46.** Amends s. 197.482, F.S., to make technical revisions to provisions governing the expiration of tax certificates.

**Section 47.** Amends s. 197.492, F.S., to allow the tax collector to submit electronically to the board of county commissioners the report showing discounts, errors, double assessments, and insolvencies relating to tax collections for which a credit is allowed. Removes the provisions that the board of county commissioners review, investigate, and charge the tax collector any tax reported as insolvent by the tax collector on personal property tax due by a solvent taxpayer.

**Section 48.** Amends s. 197.502, F.S., to provide that an application for a tax deed for a portion of property eligible to be conveyed may be made only after the tax collector has received the division of the part from the whole from the property appraiser. The tax collector is authorized to charge the tax deed applicant any fee charged to the tax collector by a vendor who provides an electronic tax deed application program or service. In addition, the tax collector is authorized to charge a \$75 tax deed application fee to a county applying for tax deeds on county-held certificates, plus reimbursement for any fee charged to the tax collector by a vendor for providing an electronic tax deed application program or service.



A person holding a tax certificate may notify the tax collector of the person's intent to apply for a tax deed at any time, but if the application will be filed within the month of the earliest date allowed, the certificateholder must provide the tax collector with a notice of intent to apply not later than 30 days before the date of application. The total amount due, including amounts for redemption or purchase of other outstanding tax certificates or unpaid taxes, must be paid in full. Requirements relating to opening bids for homestead property are deleted.

If a tax collector contracts with a title or abstract company to provide an ownership and encumbrance report to the clerk of the circuit court who must provide notice to appropriate persons before the sale of property under a tax deed, the report may be submitted by the title or abstract company to the tax collector in electronic format. Additional technical revisions are provided.

**Section 49.** Amends s. 197.542, F.S., to clarify the requirements for the sale of property for unpaid taxes at public auction, and to remove a requirement that an opening bid for the sale of homestead property be increased to include an amount equal to one-half of the assessed value of the homestead property.

**Section 50.** Amends s. 197.522, F.S., to provide notice requirements for notice to homestead property owners when homestead property is being auctioned for unpaid taxes. Provides that at least 45 days before the sale, the sheriff of the county in which the legal titleholder resides shall provide a notice that a tax certificate is outstanding on the homestead property. The original notice and sufficient copies must be prepared by the clerk of the circuit court and provided to the sheriff. The notice must be served under the process and service requirements of chapter 48, F.S.

If the sheriff is unable to make service, notice must be posted in a conspicuous place at the homestead address. The return of service must indicate if the property appears vacant, if the residence actually exists, or if it appears to be occupied. A form is provided for the posted warning notice.

**Section 51.** Amends s. 197.552, F.S., to make technical revisions and adds tax certificates on the property which were not incorporated into a tax deed and which were not satisfied when sale proceeds were distributed, to the list of liens that survive the issuance of a tax deed. Liens surviving the issuance of a tax deed may not provide a basis for foreclosure against the tax deed owner unless the owner is fully reimbursed for the price of acquiring the deed, including recording fees and documentary stamps. If a foreclosure sale results in insufficient funds to satisfy all liens, the proceeds of the foreclosure sale must be distributed pro rata in recognition of the equal dignity of the tax deed and the liens. Municipal and county liens survive as to principal only, and only if the liens have been recorded in the public records of the county prior to the tax deed sale.

**Section 52.** Amends s. 197.582, F.S., to make technical revisions and to provide that the tax collector must use any overbid funds to pay taxes that became due after an application for tax deed was made, or for omitted taxes, if any.

**Section 53.** Amends s. 192.0105, F.S., to provide that a taxpayer is deemed to have waived the right to know under the Taxpayer Bill of Rights if the taxpayer fails to provide correct contact

information to the property appraiser and the tax collector. Clarifies that under the right to redress, the taxpayer has the right to redeem real property and tax certificates at any time before full payment for a tax deed, including documentary stamps and recording fees, is made to the clerk of the court. Clarifies that property owners may not be contacted by the holder of a tax certificate for two years from the date of issuance of the certificate. Provides that notwithstanding the provisions of the Taxpayer Bill of Rights, s. 197.122, F.S., relating to liens of taxes, shall apply and it is the property owner's obligation to obtain the necessary information relating to the lien from the appropriate government officials.

**Sections 54 thru 56.** Amends ss. 194.011, 194.013, and 196.011, F.S., to correct cross-references.

**Section 57.** Creates s. 197.603, F.S., to provide a declaration of legislative findings and intent.

**Section 58.** Repeals ss. 197.202, 197.242, 197.304, 197.3041, 197.3042, 197.3043, 197.3044, 197.3045, 197.3046, 197.3047, 197.307, 197.3072, 197.3073, 197.3074, 197.3075, 197.3076, 197.3077, 197.3078, and 197.3079, F.S.

**Section 59.** Provides that the act will take effect July 1, 2009.

#### **IV. Constitutional Issues:**

##### **A. Municipality/County Mandates Restrictions:**

None.

##### **B. Public Records/Open Meetings Issues:**

None.

##### **C. Trust Funds Restrictions:**

None.

#### **V. Fiscal Impact Statement:**

##### **A. Tax/Fee Issues:**

This bill increases the overpayment amount which may be retained by a tax collector from \$5 to \$10, authorizes the tax collectors to assess and collect fees for certain electronic services, provides that the cost incurred by a tax collector for electronic mailing shall be paid by the county general fund; revises amounts to be paid by taxpayers when certain penalties are assessed; and authorizes the tax collector to charge a county \$75 for a tax deed application for county-held certificates.

##### **B. Private Sector Impact:**

Indeterminate at this time.

C. **Government Sector Impact:**

This bill has not yet been heard by the Revenue Estimating Conference so the impacts to state and local government are indeterminate at this time.

VI. **Technical Deficiencies:**

None.

VII. **Related Issues:**

None.

VIII. **Additional Information:**

A. **Committee Substitute – Statement of Substantial Changes:**

(Summarizing differences between the Committee Substitute and the prior version of the bill.)

**CS by Community Affairs on April 6, 2009:**

The CS/SB 2190 revises requirements relating to electronic notification and electronic sale of tax certificates, adds provisions relating to the notice of sale of homestead property at public auction, provides a definition for “awarded,” and provides a declaration of legislative findings and intent. The CS removes opening bid requirements when homestead property will be sold on an application for tax deed, or when such property will be sold at public auction. The CS removes a provision of the original bill which required the value adjustment board to approve or disapprove appeals on tax deferrals within 30 days after receiving the appeal. Any tax certificate available for sale on land for which a county tax deed application is pending must be struck to the county. The CS revises tax deed application requirements, and provides requirements for full payment of all outstanding amounts when a tax certificateholder applies for a tax deed.

B. **Amendments:**

None.