



CCPA-27

September 14, 1970

This is in reference to our letter of April 28, 1970, which responded to your letter of March 3, 1970, concerning the application of section 304 of Title III, Restriction on Garnishment, of the Consumer Credit Protection Act.

We wish to indicate, by way of amplification of our remarks in the second paragraph of our April letter, that we regard an Internal Revenue Service attachment of wages for taxes due the United States as a "legal procedure" within the meaning of section 302(c) of Title III even in those cases where an actual court proceeding has not taken place. Accordingly, such attachments will be considered as garnishments for purposes of the discharge provision in section 304.

Sincerely,

Robert D. Moran
Administrator