

determine that the property that is held by such real estate investment trust is insufficient to provide adequate security through the lien provided herein for the payment of taxes and fees, the real estate investment trust shall file with the Comptroller a bond, which shall be conditioned upon payment by the trust of such tax liabilities, and shall be in such amount and upon such terms as the Comptroller in his discretion may from time to time require in lieu of such bond securities approved by the Comptroller or cash in such amount as he may prescribe may be deposited with the Comptroller who may at any time, without notice to the depositor, apply them to any tax and/or interest or penalties due, and for that purpose the securities may be sold by the Comptroller at public or private sale without notice to the depositor.

322.

(3) Notice of such lien may be filed by the Comptroller with the clerk of the circuit court of the county in which said property is located[, or if located in Baltimore City, with the clerk of the Superior Court of Baltimore City]. Each clerk of court shall accurately and promptly record and index all such notices of liens filed with him by the Comptroller and shall enter such lien in the judgment docket of the court stating the name of the delinquent taxpayer, the amount of the lien and the date thereof. From the time such lien is filed with the clerk of the court of the jurisdiction in which the property covered by the lien is located and indexed as herein prescribed, such lien shall be superior to that of any subsequent mortgages, pledges, purchaser or judgment creditor and shall have the full force and effect of lien of judgment. The lien of any mortgagee, pledgee, purchaser or judgment creditor which became perfected as against third persons, prior to the filing of notice of the State's lien with the clerk, shall be preferred to the lien of the State, provided that such mortgagee, pledgee, purchaser or judgment creditor took and perfected his lien without actual notice or knowledge of the existence of the lien of the State.

342.

(b) The tax, and all increases, interests and penalties thereon shall be a lien upon all the property, real and/or personal, of any person liable to pay the same to the State from and after the time when notice has been given that such tax has become due and payable as provided herein. Notice of such lien shall be filed by the Comptroller with the clerk of the circuit court of the county in which said property is located[, or if located in Baltimore City, with the clerk of the Superior Court of Baltimore City]. Each clerk of court shall accurately and promptly record and index all such notices of lien filed with him by the Comptroller and shall enter such lien in the