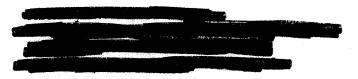


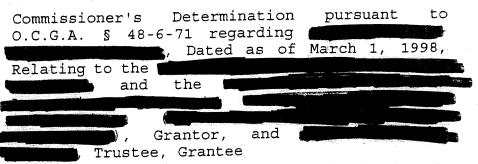
Bepartment of Revenue State of Georgia 410 Trinity-Washington Building Atlanta, Georgia 30334 (404) 656-4015

T. Jerry Jackson Commissioner

March 10, 1998



RE:



Dear :

In reply to your request pursuant to O.C.G.A. § 48-6-71 with respect to the application of the Georgia intangible recording tax imposed by O.C.G.A. § 48-6-61, it is my determination, based on the information presented in your letter dated February 26, 1998, along with the accompanying documents, that:

The Georgia intangible recording tax will not be due upon the filing for record of the graph, dated as of March 1, 1998, Relating to the graph and the graph of t

Jerry Jackson