



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

T. Jerry Jackson
Commissioner

June 15, 1998

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

RE: Commissioner's Determination pursuant to O.C.G.A. § 48-6-71 regarding loans to [REDACTED], a Wisconsin corporation, borrower and grantor, [REDACTED], grantor, and [REDACTED] Security Trustees and agents for various lenders

Dear [REDACTED]:

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 June 11, 1998, along with the accompanying documents, that:

The Georgia intangible recording tax will not be due upon the issuance of an additional series of notes evidencing additional secured indebtedness incurred by [REDACTED], since, under regulations currently promulgated and in effect, the security instrument is exempt as the [REDACTED] is a party thereto.

Very truly yours,

T. Jerry Jackson

---TJJ/TW/jt