



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

T. Jerry Jackson
Commissioner

September 29, 1998

[REDACTED]
[REDACTED]
[REDACTED]

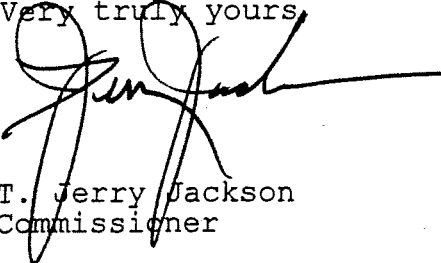
RE: Commissioner's Determination pursuant to
O.C.G.A. § 48-6-71 regarding [REDACTED]
[REDACTED] Dated as of October 1, 1998,
Relating to the [REDACTED] and
the [REDACTED]
[REDACTED], Grantor, and [REDACTED]
[REDACTED], Trustee, Grantee

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 September 25, 1998, along with the accompanying documents, that:

The Georgia intangible recording tax will not be due upon the filing for record of the above referenced [REDACTED] as the beneficial holder of the instrument, the [REDACTED], an instrumentality of the government of the United States of America, is exempt from the Georgia intangible recording tax imposed by O.C.G.A. § 48-6-61.

Very truly yours,



T. Jerry Jackson
Commissioner

--TJJ/TW/jt