



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

T. Jerry Jackson
Commissioner

April 28, 1999

[REDACTED]

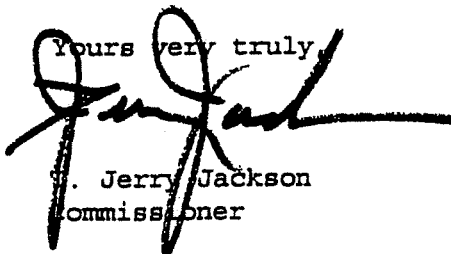
RE: Request for Commissioner's Determination Pursuant to O.C.G.A. 48-6-71 Regarding
Loans from [REDACTED], as Administrative Lender, to [REDACTED]

Dear [REDACTED]:

In reply to your request for a determination that no additional Georgia intangible recording tax is due with respect to the recording of the Additional Security Deed between [REDACTED] and [REDACTED]

It is my determination, based upon your letter dated February 23, 1999 and other supporting documentation, that the maximum amount of [REDACTED] intangible recording tax was paid on [REDACTED] to the Clerk of Superior Court of [REDACTED] on the initial security deed for [REDACTED] between [REDACTED] and [REDACTED] and that the Additional Security Deed for additional security for the indebtedness secured is a modification to the initial security instrument and no additional intangible recording tax is due as provided by O.C.G.A. 48-6-65 and Rules and Regulations 560-11-8-.04 since the maximum intangible tax was paid on the Existing Security Deed.

Yours very truly,



T. Jerry Jackson
Commissioner

cc: [REDACTED] Clerk of Superior Court