



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

T. Jerry Jackson  
Acting Commissioner

September 12, 1996

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

RE: Commissioner's Determination pursuant to O.C.G.A. 48-6-71 regarding a Deed to Secure Debt by and between [REDACTED], and [REDACTED] National Association that serves to secure Multifamily Housing Revenue Refunding Bonds in the principal amount of [REDACTED], to be recorded [REDACTED], Georgia.

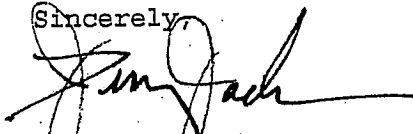
Dear [REDACTED]:

This is in reply to your request for a determination pursuant to the provision of O.C.G.A. 48-6-71, with respect to the application of Georgia intangible recording tax imposed by O.C.G.A. 48-6-61.

Based on the information presented in your letter dated August 22, 1996, along with the accompanying documents, it is my determination that:

(1) The Deed to Secure Debt described above is not securing a long term note secured by real estate as defined in O.C.G.A. 48-6-60, and may be recorded in [REDACTED], Georgia, without payment of the Georgia intangible recording tax imposed by O.C.G.A. 48-6-61.

Sincerely,



T. Jerry Jackson  
Acting Commissioner

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