



Department of Revenue  
State of Georgia

410 Trinity-Washington Building  
Atlanta, Georgia 30334  
(404) 656-4015

T. Jerry Jackson  
Acting Commissioner

February 11, 1997

[REDACTED]

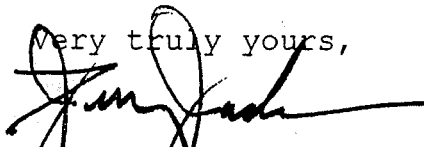
RE: Commissioner's Determination pursuant to  
O.C.G.A. § 48-6-71 regarding loans to [REDACTED]  
[REDACTED], and [REDACTED]  
[REDACTED], borrowers and grantors, by [REDACTED]  
[REDACTED], lender; [REDACTED]  
[REDACTED], Master Trustee, grantee

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 February 10, 1997, along with the accompanying documents, that:

The Georgia intangible recording tax will not be due upon the filing for record of the Deed to Secure Debt and Leasehold Deed to Secure Debt and Security Agreement from [REDACTED] and [REDACTED], in favor of [REDACTED], dated as of March 1, 1997, as the holder of the long-term note and real secured party in interest is [REDACTED] and such [REDACTED] is exempt from the intangible recording tax pursuant to O.C.G.A. § 31-7-72(e)(1).

Very truly yours,

  
T. Jerry Jackson  
Acting Commissioner

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