



Department of Revenue

State of Georgia

410 Trinity-Washington Building

Atlanta, Georgia 30334

(404) 656-4015

T. Jerry Jackson  
Commissioner

September 23, 1997

[REDACTED]

RE: Commissioner's Determination pursuant to O.C.G.A. § 48-6-71 regarding Contingent Purchase Money Deed to Secure Debt and Security Agreement (the "security instrument"), [REDACTED]

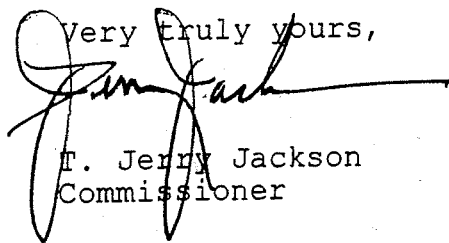
[REDACTED] Grantor, [REDACTED]

[REDACTED] 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 22, 1997, along with the accompanying documents, that:

The Georgia intangible recording tax will not be due upon the filing for record of the Contingent Purchase Money Deed to Secure Debt and Security Agreement from [REDACTED] Grantor, in favor of [REDACTED] Grantee, as the obligation secured by the security instrument is not a "long-term note secured by real estate" as defined in O.C.G.A. § 48-6-61(3).

Very truly yours,  
  
T. Jerry Jackson  
Commissioner

---TJJ/TW/jt