

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

T. Jerry Jackson  
Commissioner

October 20, 1997

[REDACTED]

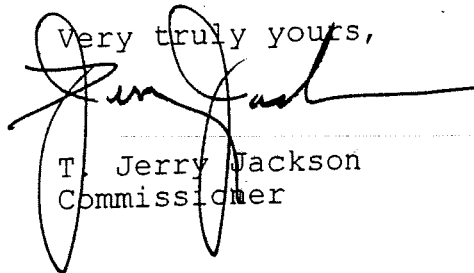
RE: Commissioner's Determination pursuant to  
O.C.G.A. § 48-6-71 regarding Contingent  
Purchase Money Deed to Secure Debt and Security  
Agreement (the "security instrument"), [REDACTED]  
[REDACTED], Grantor, [REDACTED]  
[REDACTED] Grantee

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

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