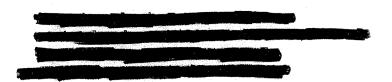


Department of Rebenue State of Georgia 410 Trinity-Washington Building Atlanta, Georgia 30334 (404) 656-4015

a. Jerry Jackson Commissioner

October 21, 1997



RE:

Commissioner's Determination pursuant to O.C.G.A. § 48-6-71 regarding , Relating to the , Grantor, and Trustee, Grantee

Dear :

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 October 14, 1997, along with the accompanying documents, that:

The Georgia intangible recording tax will not be due upon the filing for record of the ..., Relating to the ..., Relating to the ..., Trustee, Grantee, as the instrument, the beneficial holder of which is the ..., is public property and exempt from the Georgia intangible recording tax imposed by O.C.G.A. § 48-6-61.

I. Jerny Jackson Commissioner

nuly yours,