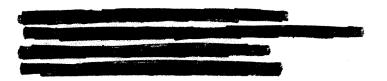


Department of Revenue State of Georgia 410 Trinity-Washington Building Atlanta, Georgia 30334 (404) 656-4015

A. Jerry Jackson Commissioner

October 21, 1997



RE:

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:

Jern Jackson