



Department of Revenue

State of Georgia

410 Trinity-Washington Building

Atlanta, Georgia 30334

(404) 656-4015

T. Jerry Jackson
Commissioner

December 4, 1997

[REDACTED]

RE: Commissioner's Determination pursuant to O.C.G.A. § 48-6-71 regarding Mortgage Modification Agreement (RE: Security Deeds, Security Agreements and Assignments of Leases Recorded in Book [REDACTED] at Page [REDACTED] and Book [REDACTED] at Page [REDACTED]), [REDACTED] Grantors, and [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 October 16, 1997, along with the accompanying documents, that:

1) There is a deficit in the intangible recording tax in the amount of [REDACTED] with respect to the security instrument recorded on [REDACTED], at Deed Book [REDACTED] Page [REDACTED];

2) There is a deficit in the intangible recording tax in the amount of [REDACTED] with respect to the security instrument recorded on [REDACTED], at Deed Book [REDACTED] Page [REDACTED];

3) The deficits described in 1) and 2) above resulted from an ignorance of the law and not out of bad faith, and the penalty imposed pursuant to O.C.G.A. § 48-6-77(a) is waived as provided in O.C.G.A. § 48-6-77(c);

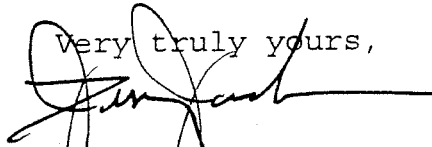
December 4, 1997

Page 2

4) Interest at the rate specified in O.C.G.A. § 48-2-40 is due on the deficits described in 1) and 2) above;

5) Upon payment of the deficits described in 1) and 2) above, and the interest described in 4) above, the above referenced security instrument may be recorded without payment of any further intangible recording tax.

Very truly yours,



T. Jerry Jackson
Commissioner

---TJJ/TW/jt