



Department of Revenue
State of Georgia
1800 Century Center Bldg.
Suite 15300
Atlanta, Georgia 30345
(404) 417-2100

Bart L. Graham
Commissioner

September 9, 2003

[REDACTED]
[REDACTED]
[REDACTED]

RE: Commissioner's Determination pursuant to O.C.G.A. 48-6-71 Regarding
Payment of Intangible Recording Tax on Recording of a Restated Mortgage
and Security Agreement between [REDACTED]
[REDACTED] ([REDACTED]), [REDACTED], [REDACTED]
[REDACTED] and [REDACTED] ([REDACTED])

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 July 8, 2003 with accompanying documentation that:

The Georgia intangible recording tax will not be due upon filing for record the Restated Mortgage and Security Agreement between [REDACTED]
[REDACTED], [REDACTED], [REDACTED] ([REDACTED]) and [REDACTED]
[REDACTED] ([REDACTED]). [REDACTED] ([REDACTED]) is an agency of the United States government and thus exempt from intangible recording tax by Department of Revenue Rule 560-11-8-.14. The exemption is on that basis only. The Rule does not afford an exemption on the basis that [REDACTED] ([REDACTED]) is a non-profit organization.

Sincerely,

Bart L. Graham