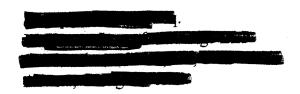


State of Georgia
1800 Century Center Plod.
1ham Suite 15300
1ner Atlanta, Georgia 30345
(404) 417-2100

September 10, 2003

Bart D. Graham Commissioner



RE: Commissioner's Determination pursuant to O.C.G.A. 48-6-71 regarding Deed to Secure Debt by and between the property of the certain other lenders, individually, and, collectively with other lenders, to the collectively with other lenders, the collectively with other lenders with the collectively with other lenders.

Dear

I have considered your request under O.C.G.A. 48-6-71 for a determination based on information contained in your letter dated October 18, 2002 with supporting documents. It is my determination that:

Georgia intangible recording tax is payable on a single indebtedness of approximately and that upon payment of the maximum intangible recording tax of \$25,000, the security instrument securing the note(s) may be recorded without payment of any further tax.

Sincerely,

Bart L. Graham