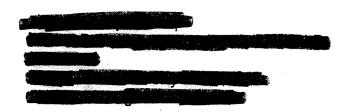


Department of Revenue State of Georgia 410 Trinity-Washington Building Atlanta, Georgia 30334 (404) 656-4015

October 31, 2000

a. Jerry Jackson Commissioner



RE: Protest of Intangible Recording Tax Paid pursuant to O.C.G.A. 48-6-76
Regarding and Request for Refund

Dear

In reply to your request pursuant to O.C.G.A. 48-6-76 for a refund for the taxes paid to the Clerk of Superior Court, and the companying documentation that your request for a refund is denied.

The Loan Assumption Agreement And Modification of Note, Deed To Secure Debt and Other Loan Documents as executed on August 31, 2000 represents not only an assumption of the outstanding balance of the original note, but establishes a new note for the advancement of funds.

Having reviewed your request for refund and O.C.G.A. 48-6-62 (b), taxes in the amount of the week were due.

⊀ery truly yours,

T. Jern/Jacksor

TJJ/jwm

