



Department of Revenue
State of Georgia

410 Trinity-Washington Building
Atlanta, Georgia 30334
(404) 656-4015

T. Jerry Jackson
Commissioner

April 18, 2001

[REDACTED]

RE: Protest of Intangible Recording Tax and Claim for Refund pursuant to
O.C.G.A. 48-6-76 [REDACTED]

Dear [REDACTED]:

In reply to your request pursuant to O.C.G.A. 48-6-76 for a refund of intangible recording taxes paid under protest to the clerk of superior court, [REDACTED] it is my determination based on your Claim For Refund, Protest and accompanying documents that your request for a refund is denied.

The Note executed on December 14, 2000 between [REDACTED] (Borrower) and [REDACTED] (Lender) contains a provision for an extension of the note by Borrower if certain conditions are met. Department of Revenue Rule 560-11-8-.03 (d) provides that a short-term note, with option to renew or extend by the borrower, where any part of the principal or interest of the note becomes due or may become due more than three years from execution is classified as long-term.

At the time of recording the security instrument, intangible recording taxes in the amount of [REDACTED] were due.

Very truly yours,

T. Jerry Jackson

TJJ/JWM/jt