

Your protests and claims for refund of the following amounts is denied:

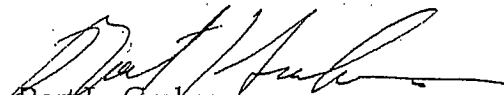
[REDACTED] \$ [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]

Total [REDACTED]

Determinations as to whether intangible recording tax is due and the amounts are made at the time of recording based on the information and documentation provided to clerks of superior court based on the facts at that time. You failed to provide adequate documentation, at the time of recording, to conclusively establish that all security instruments were part of one loan transaction. You failed to provide affidavits to establish that real property within the State of Georgia and outside Georgia were involved. You failed to provide, at the time of filing, the required affidavits to establish the values of real property in Georgia as related to the values of all property securing the transaction as provided by Department of Revenue Rule 560-11-8-.07. You failed to provide, at the time of filing, the required affidavits to establish the values of real property in each of the counties as related to the values of all real property securing the transaction as provided by Department of Revenue Rule 560-11-8-.08. You failed to comply with the requirement set forth that when real property securing a long-term note is located in more than one county, the intangible recording tax must be paid to the county in which the instrument is first recorded. Neither did you disclose on the face of the security instruments information sufficient to determine that multi-state and multi-county real property was securing the instruments.

Copies of this letter are being provided to the clerks of superior court in [REDACTED] [REDACTED] and [REDACTED] Counties as their authority to disburse the intangible recording taxes withheld pending a ruling on your protests and claims for refund.

Sincerely yours,


Bart L. Graham

cc: Clerk of Superior Court, [REDACTED]
Clerk of Superior Court, [REDACTED]
Clerk of Superior Court, [REDACTED]
Clerk of Superior Court, [REDACTED]