



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

T. Jerry Jackson
Acting Commissioner

February 5, 1997

[REDACTED]

RE: Commissioner's Determination pursuant to O.C.G.A. § 48-6-71 regarding loans from [REDACTED] as Lead Lender and Administrative Agent, and other lenders to [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 January 28, 1997, along with the accompanying documents, that:

The Georgia intangible recording tax will be due upon the filing for record of the security deeds executed by [REDACTED] in favor of [REDACTED] in the maximum amount of [REDACTED] because Section 560-11-8-.02 of the Rules of the Department of Revenue Property Tax Division provides that the maximum tax on a single security instrument is \$25,000 and Section 560-11-8-.08 of the Rules provides that multiple counterparts of a security instrument substantially identical except for the descriptions of the encumbered real property shall constitute a single security instrument.

Very truly yours

T. Jerry Jackson
Acting Commissioner

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