



Department of Revenue

State of Georgia

410 Trinity-Washington Building

Atlanta, Georgia 30334

(404) 656-4015

T. Jerry Jackson
Acting Commissioner

February 5, 1997

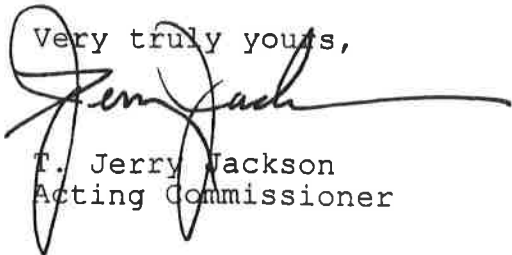
[REDACTED]

RE: Commissioner's Determination pursuant to
O.C.G.A. § 48-6-71 regarding loans from
[REDACTED] as Administrative
Lender, 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 February 4, 1997, along with the accompanying documents, that:

The Georgia intangible recording tax will not be due upon the filing for record of the Deed to Secure Debt, Assignment, and Security Agreement granted by [REDACTED] to [REDACTED] in its capacity as Administrative Lender, because the security instrument is exempt pursuant to O.C.G.A. § 48-6-65(a)(1) as the security instrument only adds security for an original indebtedness and the intangible recording tax was previously paid on the original security instrument.

Very truly yours,

T. Jerry Jackson
Acting Commissioner

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