State of South Carolina

South Carolina Tax Commission

COLUMBIA

71 PAGE 15 February 19, 1981 Deed Bk 1143 page 26

JOHN H LAFITTE JR CHARLES N PLOWDEN POBERT C WASSON

COMMISSIONERS

23564

IN REPLY REFER TO 803-758-3100

January 6, 1981

ROBERT C. WASSON

CHAIRMAN

Mr. R. David Massey Brown, Byrd, Blakely, Massey & Leaphart, P.A. Attorneys at Law P.O. Box 2464 Greenville, South Carolina 29602

Re: Documentary Stamps

Dear Mr. Massey:

Your letter of December 19, 1980, to Mr. E. G. Frampton, Assistant Director of License Tax Division, South Carolina Tax Commission, has been referred to me for reply.

This letter is to acknowledge receipt of your letter which outlines a conveyance from B. J. Fuller to Philip S. Rovner and Alan P. Shaw. It is the opinion of this writer and Mr. E. G. Frampton that this particular instrument would not be subject the documentary tax under the conditions outlined in your letter.

Yours very truly,

SOUTH CAROLINA TAX COMMISSION LICENSE TAX DIVISION J. W. LAWSON, DIRECTOR

J. A. Kirby, Jr.

Auditor

JAKJr/na

cc: Mr. E. G. Frampton

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