

Real Property Law Section NEWSLETTER

State Bar of Georgia

A Publication for Real Property Lawyers

Fall 2005

COMMENTS FROM THE CHAIR

Linda B. Curry

Weissman, Nowack, Curry & Wilco, P.C.

Here I am, a year earlier than I expected, serving as Chair of the largest section of the Georgia Bar - the Real Property Law Section. The position feels like both an honor and a tremendous responsibility, following on the heels of such a successful year last year under the able leadership of Doug Selph when the Real Property Law Section was named "Section of the Year" at the State Bar's annual meeting. At our annual planning retreat a few weeks ago, one of the tasks of the Executive Committee was to analyze why the Section received the award and how we could continue to be successful in serving our members. If asked to describe our success, in my opinion, it is due to communication and information. Through these newsletters, our new website, "blast" e-mails, and excellent seminars, we strive to keep you, our members, up to date with the latest issues and developments affecting the practice of real estate law in Georgia. Our website and its links should enable you to serve your clients and your community more effectively. On a yearly basis we are updating and improving the title standards that we all use in our practice. We continue to advocate for legislative revisions or new laws affecting real property. We are also making a real effort to encourage and link real estate attorneys with pro bono opportunities.

At a training meeting for section chairs at the State Bar last week, a chart was distributed with the number of members in each section and how those numbers had changed over the last five years. Many of the sections had lost members during that period. The Real Property Law Section has consistently increased its membership. Why? The opinion of the Bar is that attorneys initially join sections relevant to their practice, but if they find they receive no benefit to their practice, they drop the membership after a couple of years. The Executive Committee's goal is to provide information, communication and advocacy that benefits every member's practice. Join us in this mission. Let any of the Executive Committee members know your ideas, interests and needs. The name and contact information for all members of the Executive Committee is in this newsletter. Join a committee, volunteer to speak at a seminar, help analyze or promote legislation. Get involved! It will benefit your practice and your profession, and you will meet some great colleagues in the process.

"SECTION OF THE YEAR" AWARDED TO RPLS

The Real Property Law Section, State Bar of Georgia, was the proud recipient of the "Section of the Year" award, announced at the State Bar's annual meeting on Friday, June 10th, 2005, in Savannah, Georgia. Accepting the award for the RPLS was Doug Selph, 2004 -2005 Section chairman.

This is only the second time in the Section's history that it has received this prestigious award. The RPLS has also received "Special Achievement" awards.

Many thanks to all those members who participated in making this happen.



Doug Selph, (right) RPLS Chair, ('04 - '05), accepts "Section of the Year" award from Rob Reinhardt, Georgia State Bar President ('04 - '05). The award was presented at the State Bar's annual meeting this past June in Savannah.

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REAL PROPERTY LAW SECTION EXECUTIVE COMMITTEE RETREAT

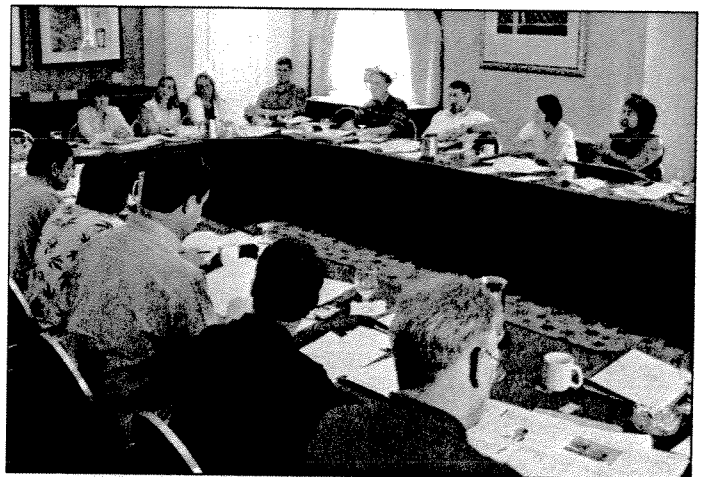
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The Executive Committee of the Real Property Law Section held its annual retreat in Savannah, Georgia, September 9th – 10th, 2005. Numerous topics of interest to Georgia real estate attorneys were addressed during the retreat. Following is a brief list of some of the topics covered by the Executive Committee at the retreat:

- The Real Property Law Section was named the top section of the State Bar of Georgia for the 2004-2005 year. Apparently, consistency, the section newsletters, accurate recordkeeping of section activities, and the addition of a section website were instrumental in winning the award.
- Title to mobile homes and title held in the name of trusts are items that the section is interested in seeing addressed legislatively. In addition, the New London case may cause some new legislation to be introduced.
- The Executive Committee is considering some proposals for modifying the terms of the awards that the Real Property Law Section gives to law students.
- The Executive Committee noted a need to have real estate attorneys volunteer to handle real estate closings on a pro bono basis (*see article in newsletter*).
- The Real Property Law Section will be hosting the Fall Commercial Real Estate seminar on November 10th in Atlanta.
- The Real Property Law Section now has 2,416 members and is the largest section of the State Bar of Georgia.
- The recent proposed revisions to the Title Standards were approved by the Board of Governors.
- Members of the Executive Committee have been meeting with representatives of the Clerks' Authority. Cross-indexing and indexing names of trustees are current topics of consideration.
- The Executive Committee discussed the continuing efforts to fight mortgage fraud.
- The Executive Committee approved a contribution of \$1,000 for the opening night party at the State Bar annual meeting. The Executive Committee also approved a \$1,500 one Gavel Sponsorship of the annual meeting.
- Members of the Executive Committee are attempting to gather some information regarding assisting real property attorneys displaced by Hurricane Katrina.

PRO BONO OPPORTUNITIES

The Legal Aid Society, Georgia Legal Services Program and the Pro Bono Project of the State Bar of Georgia have launched a new website at GeorgiaAdvocates.org. As the GeorgiaAdvocates.org website indicates, "throughout Georgia there are a number of pro bono and 'low bono' programs that help low-income people secure legal help." These organizations have developed the Georgia On-line Justice Community to connect pro bono attorneys with, *inter alia*, a listing of Volunteer Pro Bono Opportunities Sorted by Topic and Geographic Area. If you are interested, go to the GeorgiaAdvocates.org web site and click on the "Georgia On-line Justice Community" link to sign up to become a member. Then, click on "Join This Practice Area" and fill out the form on-line. Once your application has been approved, you will be able to click on "New Volunteer Opportunities" to find pro bono cases near you.



Deep in discussion are the Real Property Law Section Executive Board members at the recent planning retreat in Savannah.

MEMBERSHIP

Membership in the Real Property Law Section is continually on the increase. Our seminars, website, newsletters and e-blasts keep our members informed and current on all Real Property related issues. Below is a chart showing our recent growth.

Nov '03	Sept '04	Sept '05
2,166	2,294	2,416

KNOW ANYONE WHO MIGHT BE
INTERESTED IN JOINING?

HAVE THEM CHECK OUT OUR WEBSITE:
www.garealproperty.org.

MORTGAGE FRAUD – A GROWING CONCERN IN GEORGIA

Nancy Liu
Liu & Associates, P.C.

In the past decade, Atlanta has become the Southeast's premier business center. Unfortunately, Atlanta's success story has brought with it unexpected and unwelcome consequences. For the second straight year, Georgia and South Carolina lead the nation as mortgage fraud states, replacing California and Florida, for that unpleasant distinction (according to the May 2005 report by the Mortgage Asset Research Institute Inc. to the National Home Equity Mortgage Association). The FBI now labels mortgage fraud an "epidemic" threatening to become the next Savings & Loans scandal. Consequently, the FBI has dispatched undercover teams to investigate suspicious activity countrywide, and it is not infrequent to see major news coverage on this new alarming white collar crime wave.

In August 2005, U.S. District Judge Thomas W. Thrash Jr. sentenced a former Atlanta closing attorney Chalana C. McFarland, a/k/a Chalana M. Cosby, to 30 years in prison for her role in a massive fraud scheme that cost lenders about \$12 million. (R. Robin McDonald, *How the Lure of Easy Money Landed a DeKalb Attorney in Federal Prison*, Fulton County Daily Report, August 30, 2005).

According to the report, Ms. McFarland had negotiated mortgage loans using stolen identities. She would close both sides of flipped properties, using loan proceeds to pay for the initial purchases, and go on to execute multiple re-sales of the properties in question, sometimes the very same day at artificially inflated prices of up to \$100,000. From 1999 to 2001, she managed to sign off on at least 100 of these fraudulent and highly punishable deals. Her 30 year prison sentences is, thus far, the stiffest on record.

On June 8, 2005, 19 conspirators were indicted in a similar scheme, alleging that a developer (Phillip E. Hill, of We Build Atlanta Inc.) sold 13 homes in the 4001 Cascade Subdivision to "straw purchasers" who were paid kick-back money.

In September 2005, the U.S. Attorney's Office and FBI announced the indictment of Dale Scott Heineman, Kurt Johnson, and the Dorean Group for their allegedly fraudulent debt elimination scheme.

The Dorean Group's scheme of debt elimination was effectuated through the following steps. First, they advertise on the Internet targeting homeowners who were behind on their mortgage payments, assuring them of a "proven" legal and moral way to eliminate their outstanding mortgage while at the same time pocketing \$50,000.00. Secondly, they sign up a number of would-be-clients, and formed with their client's consent a trust in order to then record quitclaim deeds, which transferred the borrower's titles to the questionable trust. The trustees of the trust are Heineman and Johnson.

Subsequently, Dorean mails a "self-executing presentment packet" to the client's lender. In the packet, the Dorean Group claimed to act on behalf of the borrower and demanded that the lender prove the validity of its loan "to the unilateral satisfaction of the Dorean Group" within 10 days. After the prescribed 10 days, the Dorean would then record a "Power of Attorney", claiming that Heineman and/or Johnson were acting as agent and attorney-in-fact on behalf of the lender. Then, the Dorean Group would record a "Discharge of Mortgage" or "Satisfaction of Mortgage" in the recorder's office, indicating that the property securing-loans were paid in full, when in reality they were not. The bogus documents also claim to transfer the lender's secured interests to Dorean. The property's title, thus, would appear free and clear of any encumbrance. After this so-called "debt elimination," Dorean directs the client to obtain a "refinance" or home equity loan from a separate lender. Dorean receives 50% of the loan disbursement, the broker receives 10 to 25%, and the client receives the remainder.

These scandalous and alarming growing schemes are a warning to real estate lawyers to be very vigilant. In order to help combat the fraud "epidemic (as the FBI calls it)", the Georgia Real Estate Fraud Prevention Awareness Coalition (GREFPAC) has been formed. GREFPAC provides seminar and articles to raise the awareness of real estate professionals on this critical issue. For further information, please contact GREFPAC at www.grefpac.org.

TITLE STANDARDS SEMINAR

The Title Standards Seminar, chaired by RPLS Executive Board member, Mabelle Redmond, was held on October 6th at the Marriott Gwinnett Place. Just under 200 attendees received "words of wisdom" from speakers: Richard H. Siegel, W. Carlton Alford, Jr., Danny C. Bailey, Ameer Howard-Davis, D. Mark Seib, Rick Setser, Tim Minors, Patrice M. Perkins-Hooker, Christa A. Kearney and Mabelle L. Redmond. Many thanks to them for their time and effort.

NOTICE

If you know someone who has not joined the Real Property Law Section, please encourage them to do so.

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KELO VS. CITY OF NEW LONDON, TRIUMPH OR TRAGEDY

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Few decisions of the U.S. Supreme Court have garnered more attention and criticism than the Supreme Court's recent decision in Kelo v. City of New London, 125 S.Ct. 2655, 162 L.Ed. 2d 439 (2005). At issue in the case was whether the City of New London's acquisition and disposition of property acquired for the purpose of economic development qualified as a "public use" under the takings clause of the Fifth Amendment to the Constitution. That clause states: "Nor shall private property be taken for public use, without just compensation." U.S. Const., Amdt. 5.

The facts of the case were undisputed. The City of New London (hereinafter "City") had, according to the majority, suffered "decades of economic decline," which led a state agency in 1990 to designate it a "distressed municipality." Kelo, 125 S.Ct. at 2658. In addition, in 1996, the federal government closed the Naval Undersea Warfare Center which had been located in the Fort Trumbull area of the City and had employed more than 1,500 people. In 1998, the City's unemployment rate was nearly double that of the state and its population of just under 24,000 residents was at its lowest since 1920. These conditions prompted state and local officials to target New London for economic revitalization. The New London Development Corporation (hereinafter "NLDC"), a private, non-profit entity, was reactivated to assist the City in planning economic development. In January, 1998, the state authorized support of the NLDC's planning activities and a \$10,000,000.00 bond issue for the creation of a Fort Trumbull State Park. In February of that year, the pharmaceutical company, Pfizer, Inc., announced that it would build a \$300,000,000.00 research facility on a site immediately adjacent to Fort Trumbull. Public hearings were held, and the City Council authorized the NLDC to submit redevelopment plans to the appropriate state agencies. Upon obtaining state approval, the NLDC finalized an "integrated development plan" which focused on 90 acres in the Fort Trumbull area. Certain parcels were to be used for different purposes. Some were to be used for a waterfront conference hotel and a small urban village including restaurants, shopping, and a river walk. Another part of the property would include 80 new residences linked by public walkway to the remainder of the development, including the state park. Another parcel was reserved for a U.S. Coastguard Museum. Other property located immediately north of the Pfizer facility would contain 90,000 square feet of research and development office space. Another parcel would be used either to support the adjacent state park by providing parking or retail services for visitors or to support the nearby marina. Another parcel would include a renovated marina and a final stretch of river walk. The last parcels would provide land for office and retail space, parking, and water-dependent commercial uses. "In addition to creating jobs, generating tax revenue, and helping to 'build momentum for the revitalization of downtown New London,' the plan was also designed to make the City more attractive and to create leisure and recreational opportunities on the waterfront and in the park." Id. at 2659; See Generally, pp. 2658-59.

Plaintiff Kelo had lived in the Fort Trumbull area since 1997, when she had acquired her house, made extensive improvements to it, and owned and prized it for its water view. Wilhelmina Dery was born in her Fort Trumbull house in 1918, and had lived there her entire life.

Her husband, Charles, had lived in the house since they married 60 years ago. In all, the nine petitioners owned 15 properties in Fort Trumbull, four of which were located in the area designated for research and development office space, and eleven in that area that was to be used "either to support the adjacent state park by providing parking or retail services for visitors, or to support the nearby marina." Id. at 2659. Most importantly, there was no allegation that "any of these properties is blighted or otherwise in poor condition; rather, they were condemned only because they happened to be located in the development area." Id. at 2660.

The Superior Court granted a permanent restraining order prohibiting the taking of the properties located in the area designated park or marina support, but denied relief as to the properties located in the area to be devoted to office space.

After the Superior Court ruled, the Supreme Court of Connecticut, in a four to three decision, determined that the takings were authorized by the state's municipal development statute that contemplated the taking of land for economic development. The Court also held that such an economic development taking qualified as a valid public use under the federal and state constitutions. See Kelo v. City of New London, 268 Conn. 1, 9, 61, 843 A.2d 500, 509-510, 540 (2004). The Court held that a taking of private property for the sole purpose of transferring it to another private party, even though the first party is paid just compensation, would not be permissible. The Court also held that a government would not be allowed to take property "under the mere pretext of a public purpose, when its actual purpose was to bestow a private benefit." 125 S.Ct. at 2661.

The Court held, however, that in Kelo there was no evidence of an improper purpose. The Court, relying principally on the cases of Berman v. Parker, 348 U.S. 26, 99 L.Ed. 27, 75 S.Ct. 98, and Hawaii Housing Authority v. Midkiff, 467 U.S. 229, 81 L.Ed. 2d 186, 104 S.Ct. 2321, found that this "Court long ago rejected any literal requirement that condemned property be put into use for the ... public." 125 S.Ct. at 2662. The Court stated that it has embraced the broader and more natural interpretation of public use as meaning "public purpose." The Court went on to state that it has long defined that concept broadly, reflecting a longstanding policy of deference to legislative judgments as to what public needs justify the use of the takings power. The Court held that the City's determination that the area in question was distressed sufficiently to justify a program of economic rejuvenation is "entitled to deference." This was true because the City had carefully devised a development plan that would cause appreciable benefits to accrue to the community, including new jobs and increased tax revenue. The Court declined to resolve challenges of individual owners on a parcel by parcel basis, rather the Court required that the entire plan rise or fall on its own merit. The Court held that the plan served a public purpose and was justified under the Fifth Amendment of the U.S. Constitution. Id.

In so holding, the Court rejected the holding that "economic development does not qualify as a public use." It also rejected the peti-

tioners' arguments that for economic development takings, the Court should require a "reasonable certainty" that the articulated public benefits would actually materialize. *Id.* at 2667. The Court declined to adopt a heightened form of review and declined to second guess the wisdom of the means the City selected to accomplish its purpose.

The *Kelo* decision was a five to four decision in which Justice O'Connor delivered the dissenting opinion which was concurred in by Chief Justice Rehnquist, and Justices Scalia and Thomas. Justice O'Connor argued that in fact the Court had violated its first principle articulated as being the impropriety of taking property from private owner A and giving it to private owner B. Justice O'Connor stated that "under the banner of economic development, all private property is now vulnerable to being taken and transferred to another private owner, so long as it might be upgraded... i.e., given to an owner who will use it in a way the legislature deems more beneficial to the public.. in the process." *Id.* Justice O'Connor articulated three circumstances in which the taking of private property satisfies the public use clause of the Fifth Amendment. First, government may transfer private property to public ownership, such as for a road, a hospital, or a military base. Second, the government may transfer private property to private parties who make the property available for the public's use, such as a railroad, a public utility, or a stadium. Justice O'Connor further allowed that public ownership and use by the public are sometimes impractical as definitions of the scope of the public use clause. Therefore, she admitted that in cases such as *Berman* and *Midkiff*, the Court has allowed takings that serve a public purpose by remedying a specific public harm. Justice O'Connor stated that the *Berman* decision allowed takings to eliminate blighted areas and that the *Midkiff* decision allowed the State of Hawaii to redistribute property from a small number of landowners to a broader range of landowners on the ground that a real estate ownership oligopoly was harmful to the public.

Justice O'Connor stated she would hold that a redevelopment taking must be justified as a public purpose through the elimination of some harmful use of private property. Justice O'Connor stated that the *Kelo* decision "holds that the sovereign may take private property currently put to ordinary private use, and give it over for new, ordinary private use, so long as the new use is predicted to generate some secondary benefit for the public.. such as increased tax revenue, more jobs, maybe even aesthetic pleasure." She went on to state that "Nothing is to prevent the state from replacing any Motel Six with a Ritz Carlton, any home with a shopping mall, or any farm with a factory." Citing a Connecticut opinion, *Bugryn v. Bristol*, 63 Conn. App. 98, 774, A.2d 1042 (2001), where the homes and farms of four owners in their 70s and 80s were taken and given to an industrial park. According to Justice O'Connor, "Any property may now be taken for the benefit of another private party, but the fallout from this decision will not be random. The beneficiaries are likely to be those citizens with disproportionate influence and power in the political process, including large corporations and development firms. As for the victims, the government now has license to transfer property from those with fewer resources to those with more. The founders cannot have intended this perverse result. 'That alone is a just government,' wrote James Madison, 'which impartially secures to every man, whatever is his own.'" *Id.* at 2675.

The majority opinion made clear that states are free to regulate public takings more strictly than those allowed by the U.S. Supreme Court.

Thus, many legislatures throughout the country are considering statutes which are intended to limit far more strictly the use of the power of eminent domain than contemplated in *Kelo*. The Georgia legislature is currently holding hearings on the subject of eminent domain for the purpose of determining what statute might be introduced in Georgia.

The *Kelo* decision has raised the question: "Can *Kelo* happen in Georgia?" The answer would appear to be yes. Counties, cities, and housing authorities may exercise redevelopment powers, including the power to sell or otherwise dispose of property acquired by eminent domain (condemnation) to private enterprise for private uses, but only as authorized by the General Assembly. 1983 Ga. Const. Article IX, §II, ¶VII. Under the Georgia Constitution, "the development of trade, commerce, industry, and employment opportunities is a 'public purpose vital to the welfare of the people of this state' and development authorities are authorized to further that purpose." Article IX, §VI, ¶III of the Georgia Constitution. The General Assembly has authorized counties and cities to condemn property for private use under four laws: the Redevelopment Law (O.C.G.A. §8-4-1, et. seq.); the Urban Redevelopment Law (O.C.G.A. §36-61-1, et. seq.); the Redevelopment Powers Law (O.C.G.A. §36-44-1, et. seq.); and the Downtown Development Authorities Law (O.C.G.A. §36-42-1, et. seq.) The General Assembly has authorized the creation of development authorities under O.C.G.A. §36-62-1, et. seq. In addition to these laws of general applicability, the legislature has also authorized specific local governments to exercise redevelopment powers via local constitutional amendments and local acts of the General Assembly. While the General Assembly has also enacted the Development Authorities Law, O.C.G.A. §36-62-1, et. seq., and although such authorities were given broad powers, the General Assembly did not give the development authorities the power of eminent domain. O.C.G.A. §36-62-6(5). Nevertheless, it would appear that under one of the redevelopment laws set forth above, a *Kelo*-like decision could be implemented by local government in the State of Georgia.

Moreover, in Georgia, under both statutory law and common law, the decision about the public need for property to be acquired and the amount of property to be acquired for a public purpose, is a decision of the condemning body in its legislative discretion that will not be interfered with or controlled unless the authority acts in bad faith or beyond the powers conferred upon it by law. *City of Atlanta v. Heirs of Champion*, 244 Ga. 620, 261 S.E.2d 343 (1979). *Under Allright Auto Park, Inc. v. City of Atlanta*, 257 Ga. 315, 357 S.E.2d 797 (1987), the Court held that public ownership of land combined with private management was not inconsistent with public use. *Id.* at 319. However, condemnations to benefit one single enterprise are frowned upon by the appellate courts in Georgia. Compare *Brannen v. Bulloch County*, 193 Ga. App. 151; 387 S.E.2d 395 (1989), *City of Atlanta v. Atlanta Gas Light Co.*, 144 Ga. App. 157; 240 S.E.2d 730 (1977), and *Department of Transportation v. Foremost Realty, Inc.*, 135 Ga. App. 377; 218 S.E.2d 41 (1975). Both the statutory framework and Georgia Common Law are remarkably similar to the jurisprudence set forth in *Kelo*.

Withholding Obligations in Georgia in connection with the Sale of Real Property by a Disregarded Entity

*By: J. Noel Schweers III
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There are two possible withholding obligations which may arise in connection with the sale of real property in the State of Georgia. The first obligation to withhold is imposed by Federal law when the transferor is a foreign person or entity. 26 USC § 1445. The second obligation to withhold is for Georgia income tax liability under O.C.G.A. § 48-7-128 when the seller is not a Georgia resident. While the rules for withholding are generally straightforward, questions have arisen when the Seller is a single member limited liability company which has elected to be disregarded for tax purposes.

Federal Rule:

Effective September 4, 2003, when dealing with a disregarded entity, withholding is based upon the status of the owner of the entity. 26 C.F.R. §1.1445-2(b)(2)(iii)(2003). A revised sample certification was also proposed which includes a certification that the transferor is not a disregarded entity. 26 C.F.R. §1.1445-2(b)(2)(iv)(B)(2003). This makes it clear that for Federal tax purposes, the owner of the real property is deemed to be the owner of the disregarded entity and not the entity holding title to the property.

Georgia Rule:

Based upon a recent Policy Statement issued by the Georgia Department of Revenue, it appears that Georgia follows the Federal method of determining the status of a disregarded entity. See: Georgia Department of Revenue Policy Statement IT-2005-08-02-1. The Policy Statement reasons that because a disregarded entity does not exist for federal income tax purposes, it likewise does not exist for Georgia income tax purposes. The seller of the property for withholding determination purposes is the owner of the disregarded entity. The buyer of real property in Georgia must therefore determine if an LLC seller has elected to be treated as a disregarded entity. If so, the residency status of the owner of the disregarded entity must be determined in order to decide if withholding is necessary.

In light of these rules, it may be a good idea to incorporate a certification that a seller is not a disregarded entity in the seller's affidavit or other appropriate closing document. Such a certification should raise the issue at closing so that the buyer's obligation to withhold can be properly considered.

Please refer to the Real Property Section Web Page (www.garealpropertylaw.com) for a copy of the Federal regulation and the Georgia Policy Statement referenced above.

UPCOMING CALENDAR DATES REAL PROPERTY LAW SECTION STATE BAR OF GEORGIA

— 2005 —

OCTOBER 18th, 2005
RPLS EXECUTIVE BOARD MONTHLY
MEETING, ONE ALLIANCE CENTER
4th FLOOR • 4:00 – 6:00 PM

NOVEMBER 10th, 2005
FALL COMMERCIAL REAL ESTATE
LAW SEMINAR,
[COBB GALLERIA CENTER]; BOARD
MEETING IMMEDIATELY FOLLOWING.
SPEAKERS' DINNER-CANOE

DECEMBER 13th, 2005
RPLS EXECUTIVE BOARD MONTHLY
MEETING, ONE ALLIANCE CENTER
4th FLOOR • 4:00 – 6:00 PM

— 2006 —

JANUARY 17th, 2006
RPLS EXECUTIVE BOARD MONTHLY
MEETING, ONE ALLIANCE CENTER
4th FLOOR • 4:00 – 6:00 PM

FEBRUARY 3rd, 2006
SPRING RESIDENTIAL PRACTICE
SEMINAR – GPTV
FEBRUARY 9th, REPLAY

FEBRUARY 21st, 2006
RPLS EXECUTIVE BOARD MONTHLY
MEETING, ONE ALLIANCE CENTER
4th FLOOR • 4:00 – 6:00 PM

MARCH 21st, 2006
RPLS EXECUTIVE BOARD MONTHLY
MEETING, ONE ALLIANCE CENTER
4th FLOOR • 4:00 – 6:00 PM

APRIL 7th, 2006
FORECLOSURE SEMINAR

APRIL 18th, 2006
RPLS EXECUTIVE BOARD MONTHLY
MEETING, ONE ALLIANCE CENTER
4th FLOOR • 4:00 – 6:00 PM

MAY 4th - 6th, 2006
REAL PROPERTY LAW INSTITUTE,
DESTIN, FL

MAY 19th, 2006
CONSTRUCTION MATERIALMEN'S &
MECHANICS' LIEN SEMINAR

