United States Department of the Interior
National Park Service

National Register of Historic Places
Registration Form

This form is for use in nominating or requesting determinations for individual properties and districts. See instructions in How to Complete the National Register of Historic Places Registration Form (National Register Bulletin 16A). Complete each item by marking "x" in the appropriate box or by entering the information requested. If any item does not apply to the property being documented, enter "N/A" for "not applicable." For functions, architectural classification, materials, and areas of significance, enter only categories and subcategories from the instructions. Place additional entries and narrative items on continuation sheets (NPS Form 10-900a). Use a typewriter, word processor, or computer, to complete all items.

1. Name of Property

historic name Shackford Hall

other names/site number

2. Location

street & number 80 Shackford Hall Road

city or town Lake Junaluska Assembly, Lake Junaluska

state North Carolina code NC county Haywood code 087 zip code 28745

3. State/Federal Agency Certification

As the designated authority under the National Historic Preservation Act of 1986, as amended, I hereby certify that this nomination request for determination of eligibility meets the documentation standards for registering properties in the National Register of Historic Places and meets the procedural and professional requirements set forth in 36 CFR Part 60. In my opinion, the property meets does not meet the National Register Criteria. I recommend that this property be considered significant statewide locally. (See continuation sheet for additional comments.)

[Signature] [Date] 3/6/01

North Carolina Department of Cultural Resources

State or Federal agency and bureau

In my opinion, the property does not meet the National Register criteria. (See continuation sheet for additional comments.)

[Signature] [Date]

State or Federal agency and bureau

4. National Park Service Certification

I hereby certify that this property is:

- entered in the National Register
- determined eligible for the National Register
- determined not eligible for the National Register
- removed from the National Register
- other (explain):

[Signature] [Date]
Shackford Hall

Name of Property

5. Classification

Ownership of Property (Check as many boxes as apply)

☒ private
☐ public-local
☐ public-State
☐ public-Federal

Category of Property (Check only one box)

☒ building(s)
☐ district
☐ site
☐ structure
☐ object

Number of Resources within Property

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Number of contributing resources previously listed in the National Register N/A

Name of related multiple property listing (Enter "N/A" if property is not part of a multiple property listing.) N/A

6. Function or Use

Historic Functions (Enter categories from instructions)

Cat: Religion Sub: School

Current Functions (Enter categories from instructions)

Cat: Religion Sub: School

7. Description

Architectural Classification (Enter categories from instructions)

Classical Revival

Materials (Enter categories from instructions)

foundation Other: field stone
roof asphalt
walls wood
walls stone
other

Narrative Description (Describe the historic and current condition of the property on one or more continuation sheets.)
IZIA Property is associated with events that have made a significant contribution to the broad patterns of our history.

DB Property is associated with the lives of persons significant in our past.

IZIC Property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.

OD Property has yielded, or is likely to yield information important in prehistory or history.

Criteria Considerations (Mark "X" in all the boxes that apply.)

☐ A Property is associated with events that have made a significant contribution to the broad patterns of our history.

☐ B Property is associated with the lives of persons significant in our past.

☒ C Property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.

☐ D Property has yielded, or is likely to yield information important in prehistory or history.

Areas of Significance (Enter categories from instructions)

Architecture
Religion

Period of Significance
1923-1950

Significant Dates
1923

Significant Person (Complete if Criterion B is marked above)
N/A

Cultural Affiliation
N/A

Architect/Builder
Baylor, Dr. J.A.

Narrative Statement of Significance (Explain the significance of the property on one or more continuation sheets.)

9. Major Bibliographical References

Bibliography
(Cite the books, articles, and other sources used in preparing this form on one or more continuation sheets.)

Previous documentation on file (NPS)
☐ preliminary determination of individual listing (36 CFR 67) has been requested.
☐ previously listed in the National Register
☐ previously determined eligible by the National Register
☐ designated a National Historic Landmark
☐ recorded by Historic American Buildings Survey #

☐ recorded by Historic American Engineering Record #

Primary Location of Additional Data
☒ State Historic Preservation Office
☐ Other State agency
☐ Federal agency
☐ Local government
☐ University
☐ Other

Name of repository: Archives of Lake Junaluska Assembly
Shackford Hall
Haywood County, North Carolina

10. Geographical Data

Acreage of Property **less than one acre**

UTM References (Place additional UTM references on a continuation sheet)

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See continuation sheet.

Verbal Boundary Description (Describe the boundaries of the property on a continuation sheet.)

Boundary Justification (Explain why the boundaries were selected on a continuation sheet.)

11. Form Prepared By

name/title: Amanda Blosser, Preservation Planner
organization: 
date: September 30, 2000
street & number: PO Box 133
telephone: 828-862-8123
city or town: Brevard
state: NC
zip code: 28712

Additional Documentation
Submit the following items with the completed form:

Continuation Sheets

Maps
A USGS map (7.5 or 15 minute series) indicating the property's location.
A sketch map for historic districts and properties having large acreage or numerous resources.

Photographs
Representative black and white photographs of the property.

Additional items (Check with the SHPO or FPO for any additional items)

Property Owner
(Complete this item at the request of the SHPO or FPO.)

name: Lake Junaluska Assembly
street & number: PO Box 67
telephone: 828-452-2881
city or town: Lake Junaluska
state: NC
zip code: 28745

Paperwork Reduction Act Statement: This information is being collected for applications to the National Register of Historic Places to nominate properties for listing or determine eligibility for listing, to list properties, and to amend existing listings. Response to this request is required to obtain a benefit in accordance with the National Historic Preservation Act, as amended (16 U.S.C. 470 et seq.).

Estimated Burden Statement: Public reporting burden for this form is estimated to average 18.1 hours per response including the time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding this burden estimate or any aspect of this form to the Chief, Administrative Services Division, National Park Service, P.O. Box 37127, Washington, DC 20013-7127; and the Office of Management and Budget, Paperwork Reductions Project (1024-0018), Washington, DC 20503.
7. Narrative Description

Backed by gently sloping mountains of Haywood County, North Carolina, Shackford Hall sits atop a hill on a peninsula near the western shore of Lake Junaluska. From this prominent location, the two-story Classical Revival structure stands as one of the focal points in the United Methodist Church’s Lake Junaluska Assembly and is easily visible from most areas of the Assembly grounds. The building’s overall façade presentation is a symmetrically organized grand composition, approached by a steep road complimented with native rock retaining wall. The stone wall and steps, a contributing object, runs along the eastern and northern sides of the site and compliments the foundation walls of the north end of the building, which are revealed by the sloping nature of the site. A narrow circular drive begins north of the building and continues along the western side before terminating in a small parking area at the southern entrance. Three rustic style dormitories for visiting students originally surrounded Shackford Hall, which was constructed in 1923 as the main building for the religious education program. Constructed of river rock and heavy timber in a style sympathetic to the mountains of North Carolina mountains, the dormitories stood west of the building and were replaced in the 1950s with the new dormitory buildings of modern construction. The historic boundary comprises approximately one-acre surrounding the building, and includes Shackford Hall and the contributing stone wall and steps.

Designed by J.A. Baylor, architect for the Methodist Episcopal Church, South, Shackford Hall retains its original T-shaped plan with cross gable roof and is supported on a foundation of smooth river rock. Classroom wings extend along the front of the building with the central auditorium projecting to the rear. A massive pedimented portico with six two-story Ionic columns dominates the principal elevation on the east side. The portico is ascended by a set of wooden steps. The columns support a full entablature, which is carried around the entire building. A single elliptical vent is placed in the tympanum in the front pediment and the gable ends. A fanlight accents the building’s main entrance, a single door with sidelights centered in the portico. The entrances on the northern and southern ends of the building also have a single-leaf door flanked by sidelights under an elliptical fanlight. The southern entrance portico extends only one story, but the northern portico is two stories in height. The lower level is constructed of river rock to match the basement walls, which are exposed at the northern end of the building due to the sloping site. A handicap accessible ramp has been added to the southern entrance.

The main body of the building is sheathed in weatherboard siding painted white. Fenestration across the front and rear of the building is a regular pattern of single and paired one-over-one, double-hung sash with the exception of the rear wall of the auditorium, which is blind. On the north and south side of the main block and auditorium wing, the windows are consistently paired. The window trim was originally painted black. All of the original windows were replaced with aluminum clad sash that has the same profile detail as the original windows. The fenestration pattern is repeated in the basement wall on the north and east sides of the building.

The interior of Shackford Hall is functional and utilitarian in character and was not finished until the 1950s. On the first floor, the main entrance leads to an informal foyer flanked by stairs on
both sides. The foyer opens directly into a large two-story auditorium with an elevated stage at the west end. At both sides of the stage are ante-rooms which have been converted to restrooms. Two large river rock fireplaces are located in the northern and southern walls auditorium. Both sets of stairs in the foyer lead to a large open hall, which provides access to the balcony of the auditorium and upper story classrooms. The balcony extends around three sides of the auditorium. A dropped acoustical tile ceiling was added in the late 1960s. Walls in the auditorium and foyer are plasterboard, but the remainder of the building are plaster and lath. Floors on the main level and in all but one room on the upper level are tongue and groove oak boards added in the 1950s.

Shackford Hall contains sixteen classrooms that extend along double-loaded corridors to the north and south from the auditorium. Four additional classrooms are located in the basement level at the north end of the building. The classroom are identical in layout and have the same features. Doors throughout the interior are typically two-panel, with a transom window above. The ceilings in the classrooms were originally plaster and lath but like the auditorium a dropped acoustical tile ceiling was added in the 1960s. Carpet has been added on top of the oak flooring to all the classrooms except one in the basement which has vinyl tile. Each classroom has a chalkboard.
8. **Narrative Statement of Significance**

**Summary Statement**

Shackford Hall, designed by Dr. J.A. Baylor, the architect for the Methodist Episcopal Church, South, is the main religious education facility at the Lake Junaluska Assembly, located in Haywood County in the North Carolina mountains. The Southern Jurisdiction of the United Methodist Church owns and operates the Assembly, which encompasses 2,500 acres including a 250-acre lake. The Lake Junaluska Assembly, which opened in 1913, houses a variety of Methodist conferences, seminars, and meetings. From the late 1890s through the first two decades of the twentieth century, the mountains of southwest North Carolina became a center for religious retreat and revival. Lake Junaluska Assembly was one of five major religious retreats constructed in the region between 1897 and 1913. Since its founding, the Assembly has become known for the religious education programs that Dr. John Shackford instituted. The two-story Shackford Hall, constructed in 1923 and named in honor of Dr. Shackford for his contribution to the religious education, stands near the geographical center of the Assembly as a focal point for the United Methodist Church religious education training program. Shackford Hall is eligible for listing on the National Register under Criterion A for its statewide importance to the United Methodist Church educational program and locally important for Criterion C for its fully articulated Classical Revival architecture, rarely used in the mountains. Shackford Hall also meets Criteria Consideration A as a religious property deriving significance from its architecture and for its historical importance in the development of the educational mission of the United Methodist Church and in the establishment of the region as an area for retreat and contemplation.

**Historical Background and Religious Context**

The Lake Junaluska Assembly resulted from the convergence of several religious movements that developed in Southern Methodism, beginning at the turn of the twentieth century. Over the years, the Junaluska property has been held by numerous church bodies and private individuals. Over time through gradual steps, the Assembly came under the ownership of the Southern Jurisdiction of the United Methodist Church. The Assembly was first conceived in 1908 when the Laymen’s Missionary Movement of the Methodist Episcopal Church South resolved that the church should “have an assembly ground . . . for the gathering together of our forces at stated times,”¹ and that an “educational center for the Church would make training for Sunday School workers much easier.”² Dr. James Atkins, Sunday School Board Secretary for the Methodist Episcopal Church, South, and Waynesville home owner, was the most influential individual among the founding members and he used his powers of persuasion to have the Assembly located near Waynesville.³

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³ Betsy Farlow, Dan Lane, and Duane Oliver, *Haywood Homes and History* (Hazelwood, NC: Oliver Scriptium, 1993), 91.
Atkins met with John H. Vincent, his Sunday School counterpart in the Methodist Episcopal Church, who had founded the Chautauqua Institution in New York in 1874 as a place to educate Methodist Sunday School teachers and workers. 4 When the Sunday School Board met in Atkin’s Waynesville home, he drove them to near by sites and remarked that this would be an ideal location for a Southern Lake Chautauqua. Sites in Virginia and East Tennessee were mentioned in discussions with the Laymen’s movement, but the Waynesville location, being on the main railroad, was the preferred location. After several years of searching, the assembly decided to purchase land in Haywood County, in the heart of North Carolina mountains. The Southern Assembly was incorporated in 1909 “to establish and maintain . . . assemblies, conventions, conferences, public and other operations . . . [and] also a religious resort, with permanent and temporary dwelling for health, rest, recreation, Christian work, and fellowship.” 5 Thus a desire of an ecumenically inspired Southern Methodist missionary movement brought about the permanent camp meeting ground for preaching and a Southern Chautauqua center for religious education.

By the first decade of the twentieth century, the mountains of southwestern North Carolina had become a center for Protestant religious revival and retreats. Between the late 1890s through the 1920s, five large religious retreats and camps had been founded in Haywood, Buncombe, and Henderson counties. In Buncombe County, Montreat (1897) was founded as a Presbyterian retreat; the Southern Baptist Convention established Ridgecrest in 1907, and the Blue Ridge Assembly was founded as a center for religious education by the YWCA in 1912. The Lake Junaluska Assembly founded their center in 1913 in Haywood County, and Lake Kanuga in central Henderson County became the Episcopal Church Conference Center in 1929. 6

The first conference was held at Lake Junaluska in 1913. The third Laymen’s Missionary Conference was held at the new Assembly grounds. The physical plan of the Assembly was still crude and early photographs show how barren the valley was. At this time the main geographical feature, the lake, had not been constructed. The first conference members stayed in Waynesville and rode out daily on the train to the Assembly grounds. A crowd of 4,000 people came to the first conference and the assembly managed to raise more than $150,000 to finance the beginning the assembly grounds. 7 As the Assembly gradually developed, public buildings and private cottages surrounded the lake.

The “Boat House” was the home of the first leadership training program at Lake Junaluska. In 1923, the Sunday School Board was headed by Atkin’s son-in-law, Dr. John W. Shackford. He was Superintendent of Teacher Training Programs of the General Sunday School Board in Nashville and because of his qualification he was elected by the General Conference to be the General Secretary of the Sunday School Board. As the Secretary, he was responsible for laying the foundations for the Methodist Standard Training Schools which became the model for teacher training across the

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4 Farlow, 91.
5 Crum, 92.
7 G. Ross Freeman, 3.
In a speech, Shackford remembered that: “At a meeting of the Sunday School Board in 1916, I presented a plan for developing a system of training. It was to be a model for similar schools across the church. It called for a central leadership school to be held annually at Junaluska under the immediate direction of the superintendent of training. It was to be a model for similar schools in the annual conference . . . . The board approved the plan and Jenalushka, opened only three years before, was an ideal place at which to launch the project.”9 Classes met in the auditorium, hotel rooms, on the porches, and even under trees. One of the first material needs of this project was a building. There was no money available so whatever was constructed had to be temporary. A lake front lot was selected with the idea that the building could be converted to a boat house later.

The boat house was completed in 1918, as were approximately two dozen houses and two private lodges. Many of the houses were built in the Craftsman style while the two lodges were built in the Rustic Revival style. In 1920 a bridge was constructed over the dam and the Terrace Hotel was completed. Built in the Rustic Revival style, the Terrace Hotel typified many of the buildings at the Assembly. A second administration building, which had a soda shop was built west of the Bell Tower in 1921. A frame bath house and golf course were also built that year. The Assembly also acquired the site of the Junaluska Inn and built the Centenary Building, now know at the Lambuth Inn.

The Sunday School board quickly realized that the boat house was inadequate for the space requirements of a growing leadership training program. The Board published a prospectus in 1920 that encouraged members of the assembly to “study their needs and the plans to supply these needs.”10 With the multiplicity of meetings and the continued growth in the crowds coming to the Assembly, the Board deemed “it absolutely necessary to house the Training School in a building of its own, equipped for modern Sunday school work and away from the necessary noise of those who come to the Lake just for recreation and pleasure.”11 Because of some financial difficulties, the cost of the building had to be kept to a minimum.

The Administration Building, as the Sunday School Board called it in their prospectus, was designed by Dr. J.A. Baylor, architect for the Methodist Episcopal Church, South. The 1920s prospectus described the proposed building in great detail. Located as close to the geographical center of the grounds as possible, the front of the building was to be parallel to and facing the great dam. The building should lie to the west of the athletic fields with the rear elevation overlooking the lake. The north end was run alongside of the drive “by the tollgate, and the south end skirt the woods along the edge of the peninsula.”12 The massive columns of the front portico were to be “the first object to greet the eye of the visitor as the train rounds the foot of the mountain into the beautiful little station nestling on the side of the lake.”13 The plans of the Sunday School Board indicate that the Administration Building, later to be named Shackford Hall, was to be a visually imposing building and a landmark for the Assembly.

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9 G. Ross Freeman, 2.
10 Sunday School Prospectus, 3.
11 Sunday School Prospectus, 3.
12 Sunday School Prospectus, 4.
13 Sunday School Prospectus, 4.
In addition to the visual impact, the Sunday School Board planned for many amenities that complimented their educational mission. The building "would have been altogether incomplete without an auditorium for general meeting and assemblies. This need is well provided for with the auditorium at the rear of the building, with a total seating capacity of approximately seven hundred and fifty. . . . It will be one of the most attractive assembly rooms to be found anywhere." The Board also planned for a cafeteria on the first floor of the building as well as a reference library. The institution was designed to be a complete education center with three separate dormitories to house the students.

The boat house was used through the summer of 1922, when the General Conference of the Methodist Episcopal Church (South) granted the Sunday School Board $50,000 to build a home for the training of its teachers. The Sunday School Board decided to exchange the Boat House property for the property where Shackford Hall currently stands. The religious education building was built in 1923, and was called Shackford Hall in honor of Dr. Shackford's commitment to religious education. Only the exterior of the building was completed in 1923, the interior of the building was only "roughed in" due to the fact that the money granted by the General Conference was not sufficient to complete the job. Although the interior was not as finely finished as desired, the building continued to be used for its designated purpose: as a classroom building for educating Sunday School teachers and as an auditorium.

The assembly struggled financially through the 1920s. Large amounts of money were borrowed to finance the undertaking. By 1925, "there was increasing pressure from creditors, and the bills could not be met as was desired." In 1929, the stockholders of the corporation deeded the property to the Methodist Episcopal Church (South). By this time, the Assembly had incurred $300,000 of debt, and the official name was changed from the Southern Assembly to the Lake Junaluska Methodist Assembly. The Methodist Church took over 1,250 acres of land and the 250-acre lake as well as all of the buildings.

The change of ownership at Lake Junaluska coincided with the onset of the Great Depression. The financial situation worsened until the Assembly was placed in receivership in 1932. By 1936, sufficient money had been raised to pay off the debts of the Assembly and the Methodist Episcopal Church (South) assumed ownership of the Assembly in 1938. The Assembly carried on their programs throughout the Second World War, and at the conclusion of the war the organization began a program of expansion which would make it the first assembly to “provide a year-around, instead of summer-only program for conventions, study groups, and other meetings, both religious and lay.” The completion of Shackford Hall was part of the Assembly’s expansion programs.

The Assembly changed hands again in 1952 and became part of the Southeastern Jurisdiction of the United Methodist Church. Soon after the change in ownership, the Annual Conferences’ Board of

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14 Sunday School Prospectus, 5.
15 Sunday School Prospectus, 5.
16 Shackford Hall,
17 Crum, 100-101.
18 Crum, 100.
Education was asked for donations to complete individual rooms. Because of the financial situation, Shackford Hall’s interior largely remains unfinished. However, Shackford Hall has been an internal part of the cultural and religious programs at the Assembly. It has been in continuous use since its construction in 1923, still serving as the main religious education building.

Architectural Context

Shackford Hall was part of a decade of intense period of building during the 1920s at Lake Junaluska Assembly. It is one of the few remaining unaltered buildings at the Assembly and a fine example of the Classical Revival style, rare in the mountains of western North Carolina. Shackford Hall stands on a raised stone basement that contributes to its monumental presence, which is also reinforced by its elevated location overlooking the lake. The building features a gable roof that terminates in Classical Revival style pediments that are adorned with semi-elliptical windows. Other Classical Revival elements of the building include three fanlighted entrances with sidelights, two porches with Ionic columns, and a colossal portico on the façade that highlights the central five bays. Shackford Hall exhibits excellent integrity, retaining all original exterior woodwork, detailing, and siding, and having had no additions constructed to the original building.

Lambuth Inn and Shackford Hall are the only two Classical Revival buildings on the grounds of the Lake Junaluska Assembly. Built in 1921, Lambuth Inn was also designed by Dr. J.A. Baylor.\(^{21}\) It sits on a knoll on the north shore of the lake on the previous site of the Junaluska Inn and like Shackford Hall is accessed by a narrow road. Lambuth Inn is a two-story hotel with a projecting pedimented portico, behind which is a shed-roof two-story porch across the full width. During the 1950s, the original block of the inn had wings added to the east and west elevations.

Most of the buildings associated with religious retreats in the region were constructed in the Rustic Revival style. Along with Shackford Hall and the Lambuth Inn at Lake Junaluska, Robert E. Lee Hall (NR 1979), the centerpiece of the grounds at the Blue Ridge Assembly in Buncombe County, was also built in the Classical Revival style. Designed by New York architect, Louis Jallade, Robert E. Lee Hall was constructed in 1912. Like Shackford Hall, Robert E. Lee Hall features a colossal portico but it has less classical detailing than Shackford Hall.

While there are other examples of the Classical Revival style in Haywood County, Shackford Hall appears to be one of the finest of those dating from the early twentieth century.\(^{22}\) These Classical Revival buildings include the Haywood County Courthouse, the Municipal Building, the Masons Temple and the First United Methodist Church all located in Waynesville.\(^{23}\)

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\(^{21}\) Lambuth Inn was placed on the National Register of Historic Places in 1984.

\(^{22}\) Betsy Farlow, Dan Lane, and Duane Oliver, *Haywood Homes and History*, (Hazelwood, NC: Oliver Scriptium, 1993), 99.

\(^{23}\) Haywood County survey files; field observation by Amanda Blosser August 2000.
**Major Bibliographic References**


Southeastern Jurisdiction of the United Methodist Church, Commission on Archives and History records, Lake Junaluska, North Carolina.

10. Geographical Data

Verbal Boundary Description

The boundary for this nomination is shown as the solid line on the accompanying tax map. The nominated tract is approximately one acre of the larger tax parcel 8816-89-7735. The boundary follows within ten feet of the outside perimeter of the stone wall encircling Shackford Hall, and follows the tax parcel boundary to the east, and the southwest side of Shackford Hall Road to the northeast of the building.

Boundary Justification

The property included in this nomination is an approximately one-acre tract which comprises the location and setting of Shackford Hall. It is part of the original tract purchased by the Southern Assembly of the Methodist Church, and includes Shackford Hall, stone wall and steps, all constructed in 1923.
This map is prepared for the inventory of real property found within this jurisdiction, and is compiled from recorded deeds, plats, and other public records and data. Users of the map are hereby notified that the aforementioned public primary information sources should be consulted for the verification of the information contained on the map. Haywood County assumes no legal responsibility for the information contained on this map.

Shackford Hall
Haywood County
North Carolina
Haywood County
Land Records / GIS

1 Inch = 948.8125 Feet.
Date: 9/20/00

PIN: 8616-89-7735
CURR_NAME: LAKE JUNALUSKA ASSEMBLY INC
MAIL_ADDR: PO BOX 67
MAIL_ADDR2:
CITY: LAKE JUNALUSKA
STATE: NC
ZIP: 28745
MAPSHEET: 8616.02
CUR_BK_PG: 34/476
CALC AC: 297.06
LOCATION: 689 LAKESHORE DR
SALE_DATE: 2/9/12
SALE_PRICE: 0
CID_NUMBER: 14703
JUR: 16A
LEGAL_DESC: 689 LAKESHORE DR
SUBDIV:
SUBDIV_DESC:
BLDG_VALUE: 14784510
LAND_VALUE: 2340400
DEFF_VALUE: 0
ASSE_VALUE: 17124910
Figure 2
SHACKFORD HALL
TOP FLOOR

SCALE: 1 inch = 20 feet
Figure 3 —
SHACKFORD HALL
BASEMENT FLOOR

SCALE: 1 inch = 20 feet