



**BLANCO TACKABERY**  
Attorneys and Counsellors at Law

**Carolyn W. Scogin**  
cws@blancolaw.com

336.293.9063  
P.O. Drawer 25008  
Winston-Salem, NC 27114-5008  
404 North Marshall St.  
Winston-Salem, NC 27101  
phone 336.293.9000  
fax 336.293.9030  
www.blancolaw.com

May 21, 2025

Low-Income Housing Tax Credit Program  
South Carolina State Housing Finance and  
Development Authority  
300-C Outlet Pointe Blvd.  
Columbia, SC 29210

RE: The Palms at Oak Street  
1525 Oak Street  
Myrtle Beach, SC 29577  
HD The Palms, LLC

Ladies and Gentlemen:

This opinion is rendered in compliance with the requirements of the Low-Income Housing Tax Credit Program.

The undersigned is a licensed attorney-at-law, licensed to practice before the highest court of the state in which I practice. A significant portion of my practice relates to tax matters and the interpretation of the Internal Revenue Code of 1986 (the "Code"), as amended. I am familiar with the provisions of Section 42 of the Internal Revenue Code, as amended, and have advised the owner with regard to its applicability to the above-referenced development.

Based upon an independent investigation into the facts and circumstances surrounding the above-referenced development, I am of the opinion that said development qualifies for an allocation of the Low-Income Housing Tax Credit pursuant to Section 42 of the Code, as amended. I have reviewed and signed the above-referenced development application dated May 19, 2025.

It is my intention that the South Carolina State Housing Finance and Development Authority may rely on this opinion in making its determination whether or not to offer a reservation of the Low-Income Housing Tax Credit to this development.

Very truly yours,

Blanco Tackabery & Matamoros, P.A.

Carolyn W. Scogin