

# Coleman | Talley

*A Limited Liability Partnership*

[colemantalley.com](http://colemantalley.com)

109 S. Ashley Street

Valdosta, GA 31601

Phone 229 242 7562

Fax 229 333 0885

3344 Peachtree Rd, NE

Suite 1950

Atlanta, GA 30326

Phone (770) 698-9556 Fax

(770) 698-9729

1 Independent Drive

Suite 3130

Jacksonville, FL 32202

Phone 904 456 8949

Fax 904 456 8948

May 21, 2025

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

**Development:** Chester Townhouses Phase II  
**Address:** 628 Lancaster Highway, Chester, SC 29706  
**Applicant:** New Chester Townhouses II of SC, LLC,  
a South Carolina limited liability company

Ladies and Gentlemen:

You have asked that we render our opinion that CAHEC Properties Corporation, a North Carolina nonprofit corporation that is qualified to do business in South Carolina (the "Sponsor"), is a qualified nonprofit organization within the meaning of Section 42(h)(5) of the Internal Revenue Code. We understand that you require this opinion as a prerequisite to your consideration of making an allocation of Low-Income Housing Tax Credits to New Chester Townhouses II of SC, LLC, a South Carolina limited liability company, from the set-aside reserved for the use of qualified nonprofit organizations. Sponsor owns One Hundred Percent (100%) of the membership interest in CAHEC MM, LLC, a North Carolina limited liability company, which owns One Hundred Percent (100%) of the membership interest in Chester II MM, LLC, a South Carolina limited liability company, the Managing Member of New Chester Townhouses II of SC, LLC, a South Carolina limited liability company.

In rendering our opinion, we have reviewed the Articles of Incorporation and Bylaws of Sponsor as well as the Letter of Determination dated June 6, 2002 from the Internal Revenue Service. We have also examined the records of Sponsor to determine whether or not there exists an identity of interest between Sponsor and any for profit participant in the above-referenced development, Chester Townhouses Phase II (the "development").

Based upon our review of the foregoing, it is our opinion that:

- (1) Sponsor is a "qualified nonprofit organization" within the meaning of Section 42(h)(5) of the Internal Revenue Code; and
- (2) there is no identity of interest existing between Sponsor and any for profit participant in the development and that no impermissible affiliation with or control by a for profit organization exists with respect to the development.

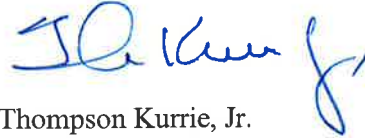
May 21, 2025

Page 2 of 2

---

It is our intention that this opinion be relied upon by you in making your determination as to the eligibility of the development to receive Low-Income Housing Tax Credits.

Yours very truly,

A handwritten signature in blue ink, appearing to read "Thompson Kurrie, Jr.", with a stylized flourish at the end.

Thompson Kurrie, Jr.  
for Coleman Talley LLP