

EXHIBIT P

Identity of Interest Certification

The Applicant Lancaster Manor 2023 L.L.C., has represented to the Authority in the Low-Income Housing Tax Credit Application that the Applicant ☒ **has** ☐ **does not have** an "identity of interest." An "identity of interest" exists if any of the following conditions exist:

- A. When there is any financial interest of the Applicant or Owner and any other member of the development team.
- B. When one or more of the officers, directors, stockholders, members, or partners of the Applicant or Owner is also an officer, director, stockholder, member, or partner of any other member of the development team.
- C. When any officer, director, stockholder, member or partner of the Applicant or Owner has any financial interest whatsoever in any other member of the development team.
- D. When any other member of the development team advances any funds to the Applicant or Owner.
- E. When any other member of the development team provides and pays, on behalf of the Applicant or Owner, the cost of any architectural services or engineering services other than those of a surveyor, general superintendent, or engineer employed by any other member of the development team in connection with its obligations under its contract with the Applicant or Owner.
- F. When any other member of the development team takes stock or any interest in the Owner entity as part of the consideration to be paid him/her.
- G. When any relationship exists which would give the Applicant or Owner or any other member of the development team control or influence over the price of the contract or the price paid to any other member of the development team or to a subcontractor, material supplier or lessor of equipment.
- H. When there exist (or come into being) any side deals, agreements, contracts or undertakings entered into or contemplated, thereby altering, amending, or canceling any of the required application or closing (should there be a closing) documents.

If there is an 'identity of interest', please state what the 'identity of interest' is:

American Community Developers, Inc. ("ACD"), the Developer and Manager of the Managing Member, is a member of ACD Partners XLIV L.L.C., a member of the Applicant/Owner. Therefore an Identity of Interest condition exists per sections A, B, C, and F above. ACD plans to advance funds to the Applicant/Owner during the application process, including for architectural services. ACD is the 100% Owner of St. Clair Construction Company, the 100% owner of St. Clair Construction Company of South Carolina L.L.C., the general contractor for the project. ACD has a side agreement with Multifamily Coalition for Affordable Housing, Manager and 100% Owner of the Managing Member of the Applicant/Owner Lancaster Manor 2023 L.L.C.

The above Applicant certifies that fees and charges collected by one of the parties from related parties does not exceed the norm for such services etc., for the area the development is located in.

The undersigned hereby certifies and acknowledges that the South Carolina State Housing Finance and Development Authority may rely upon this certification in making an allocation of tax credits.

Applicant Signature: 

Date: 5/19/25

Applicant Name: Lancaster Manor 2023 L.L.C.

By: Gerald A. Krueger, President of American Community
Developers, Inc., Manager of the Managing Member

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