

May 19, 2025

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

Re: Capstone at Greenwood Commons  
Greenwood, Greenwood County, South Carolina  
Capstone at Greenwood Commons, LP

Ladies and Gentlemen:

You have asked that we render our opinion that The Banyan Foundation, Inc, a North Carolina non-profit corporation which 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 Capstone at Greenwood Commons, LP, from the set-aside reserved for the use of qualified nonprofit organizations. Sponsor owns One Hundred Percent (100%) of the shares of stock in Banyan GP Holdings, Inc., an Alabama corporation, which is the sole Member and sole Manager of Capstone at Greenwood Commons GP, LLC, the General Partner of Capstone at Greenwood Commons, LP.

In rendering our opinion, we have reviewed the Articles of Incorporation and Bylaws of Sponsor as well as the Letter of Determination dated January 7, 2010, 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, Capstone at Greenwood Commons (the "Development").

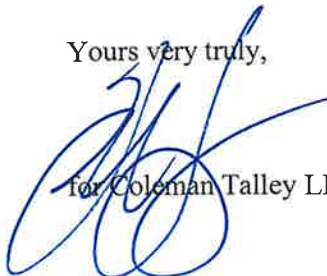
Based upon our review of the foregoing, it is our opinion that:

(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.

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,



for Coleman Talley LLP