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May 23, 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: Name of Development: **Pulaski Place**
 Address: **1900 Pulaski Street, Columbia, South Carolina 29201**
 Applicant: **Pulaski Place Apartments, LP**

Ladies and Gentlemen:

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

We have acted as counsel to Pulaski Place Apartments, LP, a South Carolina limited partnership (the “Applicant”) in connection with its application to the South Carolina State Housing Finance and Development Authority (the “Authority”) for a reservation of the Low-Income Housing Tax Credit for the Applicant’s proposed development of the Pulaski Place Apartments project at 1900 Pulaski Street, Columbia, South Carolina (the “Development”). This opinion is being rendered at the request of the Authority and is intended that the Authority may rely upon this opinion in making its determination whether or not to offer a reservation of the Low-Income Housing Tax Credit with respect to the Development.

The undersigned firm employs attorneys-at-law, licensed to practice before the highest court in the State of South Carolina. A portion of the firm’s practice relates to tax matters and the interpretation of the Internal Revenue Code of 1986 (the “Code”), as amended. We are familiar with the provisions of Section 42 of the Code, as amended, and have advised the owner with regard to its applicability to the Development. The opinions set forth herein are limited to matters governed by the laws of the State of South Carolina and the laws of the United States (the “Applicable Laws”). No opinion is expressed herein as to the laws of any other jurisdiction.

Subject to the foregoing and to the qualifications, limitations, exceptions and assumptions set forth below, and upon the Applicable Laws and facts of which we are aware on the date of this opinion letter, we are of the opinion as of the date hereof:

1. Based upon an independent investigation into the facts and circumstances surrounding the 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 23, 2025.

In rendering this opinion, we have assumed the Applicant will comply with all applicable requirements of the Act in order to qualify for the Low-Income Housing Tax Credit authorized thereunder from and after the date hereof. We assume no duty to update or supplement this opinion if there are changes in the Act, the Applicable Laws or the facts that we have reviewed after the date hereof. This opinion is rendered solely for the benefit of the Authority. This opinion may not be used or relied upon by any other persons or entities or for any other purpose without our express written consent.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Parker Poe Adams & Bernstein LLP", is written over a faint, light blue rectangular background.

PARKER POE ADAMS & BERNSTEIN LLP